Appendix 14

Responses to Comments on Draft Environmental Impact Statement

APPENDIX 14

RESPONSE TO COMMENTS RECEIVED ON THE DRAFT EIS

Introduction

This appendix includes all substantive comments received by the FAA during the Draft Environmental Impact Statement (Draft EIS) comment period. A response to each substantive comment is also included in this appendix. Additionally, where appropriate and as noted in the individual responses, the EIS document has been revised to address specific comments. Comments were received from federal, state, and local agencies, tribes, project stakeholders, and members of the general public.

Organization

Comments were received via letter, email, project website, comment form, and during the public hearing testimony. Agency, tribe, and stakeholder comment letters have individual comments noted by a black line in the left hand page margin running the length of the comment. Each comment has been coded with a unique identifier to correspond with the comment response following each comment letter. The comment response includes a copy of the individual comment text and provides the FAA's response.

The following agencies, tribes, stakeholder groups, and individuals submitted comments to the FAA on the Draft EIS during the comment period.

Organization	Date
U.S. Environmental Protection Agency	December 18, 2012
U.S Fish and Wildlife Service	December 18, 2012
The State of Alaska	December 18, 2012
NOAA - National Marine Fisheries Service	December 17, 2012
Native Village of Afognak	December 17, 2012
Sun'aq Tribe of Kodiak	December 17, 2012
Sun'aq Tribe of Kodiak	December 05, 2012
Koniag Corporation	October 30, 2012
Kodiak Audubon Society	December 18, 2012
Kodiak State Parks Citizens Advisory Board	December 04, 2012
John Brown	November 10, 2012
Kelly Hawk	December 04, 2012
Rachel King	December 04, 2012
Mike Sirofchuck	December 12, 2012
Patrick Holmes	December 17, 2012
Wanda Schulze	December 18, 2012

Public Hearing Testimony Comments

A transcript of the public hearing testimony is provided with each comment noted by a black line in the left hand page margin running the length of the comment. The following individuals provided oral comments to the FAA on the Draft EIS during the Draft EIS Public hearing conducted December 6, 2012. The affiliation of the individual is listed if it was provided during the testimony.

Name	Affiliation
Mike Sirofchuck	Kodiak State Parks Citizens Advisory Board
Stacy Studebaker	Kodiak Audubon Society
Patrick Holmes	
Iver Malutin	

Response to U.S. Environmental Protection Agency
Christine B. Reichgott, Manager, Environmental Review and Sediments Management Unit
December 18, 2012

Comment EPA 1
Thank you for the opportunity to review the Draft Environmental Impact Statement for the Improvements to the Runway Safety Area at the Kodiak Airport project in Kodiak, Alaska (CEQ #20120329). We have reviewed the EIS in accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act.

Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions as well as the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA. We have given the EIS an overall rating of EC-2 (Environmental Concerns-Insufficient Information). A description of our rating system is enclosed.

Response EPA 1
Thank you for your comment.

Comment EPA 2
We appreciate the tremendous effort of the Federal Aviation Administration to produce a reader-friendly and succinct document that clearly articulates the anticipated impacts of the proposed project. We believe that the visual graphics, maps, and impact summary tables are very useful to the reader. We also commend the FAA for developing a helpful project website and for hosting numerous stakeholder meetings.

Response EPA 2
Thank you for your comment.

Comment EPA 3
The EIS identifies Alternatives 2 and 7 as FAA's Preferred Alternatives for Runways 07/25 and 18/36, respectively. Each Preferred Alternative incorporates an Engineered Material Arresting System and steep fill slopes (2:1), thus greatly minimizing the amount of fill and area of impact. For Runway 18/36, the RSA build-out is primarily on the southern end and away from the mouth of the Buskin River, which avoids direct impacts to that important waterbody. We commend FAA for developing and selecting these Preferred Alternatives that incorporate such effective avoidance and mitigation.

Response EPA 3
Thank you for your comment.

Comment EPA 4
We continue to have concerns, however, regarding the seemingly unavoidable impacts to marine resources for both the Runway 25 and 36 extensions. These project features will not only contribute to the cumulative impacts to resources from the airport and other surrounding features, but also will likely cause the direct loss of intertidal and subtidal marine habitat, loss of marine life, decreased water quality and reduced habitat connectivity.

Response EPA 4
Thank you for your comment. The Federal Aviation Administration (FAA) understands the concerns regarding potential for impacts to resources. The Preferred Alternatives chosen (Alt 2 for Runway 07/25 and Alt 7 for Runway 18/36) were selected because they minimize the environmental impacts. Chapter 6 in the Draft Environmental Impact Statement ("Mitigation") has been revised in the Final Environmental Impact Statement to describe more fully the proposed mitigation plan for this project.

Comment EPA 5
While the Draft EIS adequately details the FAA's mandate to increase RSA to the extent practicable, we believe it does not sufficiently quantify the incremental reduction in the extent of personal injury and aircraft damage anticipated with each alternative. We believe this information would be helpful in order to substantiate the resource impacts and project cost. FAA may have statewide or national statistics developed through its RSA program that have quantified the effectiveness of various increases in RSA at airports similar to Kodiak. This information should be utilized to develop an estimate of the increase in safety for each alternative.

Response EPA 5
Thank you for your comment. The risks of an aircraft overrunning or undershooting a runway depend on a number of circumstances related to conditions like weather, runway surface conditions, distance required to land or take off, available runway distance, terrain obstacles, and many others. Additionally, human error and mechanical malfunction of aircraft also factor into the potential for accidents that could benefit from standard Runway Safety Areas (RSAs).

The Federal Aviation Administration (FAA) has determined that each of the alternatives carried forward in the Draft and Final Environmental Impact Statements (DEIS and FEIS) would meet the project's purpose and need of improving the RSAs at Kodiak Airport to meet FAA standards to the extent practicable. It is not possible to accurately estimate the difference in safety enhancement between each of the alternatives for all relevant operating conditions and scenarios. Moreover, it would not be useful to do so, since the Preferred Alternatives, developed in coordination with federal, state, tribal, and local stakeholders, are also the environmentally preferable alternatives.

Comment EPA 6
Again, we appreciate the opportunity to offer comments on the Draft EIS and look forward to continuing to work with the FAA on addressing the issues we have identified. We also would appreciate continued involvement as the mitigation plan is developed.

Response EPA 6
Thank you for your comment. Chapter 6 in the Draft Environmental Impact Statement (DEIS) ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe more fully the proposed mitigation plan for this project. In developing the mitigation plan, the Federal Aviation Administration (FAA) and the Department of Transportation and Public Facilities (ADOT&PF) coordinated with the appropriate agencies, including EPA.

Response to U.S. Fish and Wildlife Service
Doug Campbell, Chief, Division of Realty
December 18, 2012

Comment FWS 1
Please accept my apology for the lateness of this reply for comments on the EIS and doing it by email.
I have no substantive comments on the ANILCA Title XI section except to say that it is very well done. The only improvement would be to clearly identify those sections within the Summary EIS Findings (Section 4.24.3) that provide the information upon which the detailed findings required in Section 1104(g)(2) of ANILCA will be made.

Response FWS 1
Thank you for your comment. Consistent with your comment, the Alaska National Interest Lands Conservation Act (ANILCA) Title XI section has been revised in the Final Environmental Impact Statement (FEIS) to identify those sections within the FEIS that provide the information upon which the detailed findings required in Section 1104(g)(2) of ANILCA will be made in the Record of Decision.

Comment FWS 2
Also it is likely that the Fish and Wildlife Service will be issuing the ANILCA right of way permit for the portion of the project on Alaska Maritime National Wildlife Refuge land. With that in my mind, please let DOT know to provide us with an application for the right of way. We look forward to working with FAA and DOT on the right of way permit.

Response FWS 2
Thank you for your comment. The right of way application has been provided to U.S. Fish & Wildlife Service (USFWS).

Response to The State of Alaska
Susan Magee, ANILCA Program Coordinator
December 18, 2012

Comment SOA 1

[The Alaska National Interest Lands Conservation Act (ANILCA)]
The DEIS does not include an ANILCA Section 810 analysis. Based on discussions with the Federal Aviation Administration (FAA) and the USCG, it is our understanding that the USCG determined that since the submerged lands were withdrawn for military purposes, ANILCA Title VIII, including the requirements in Section 810, do not apply to the proposed project, and that subsistence uses occurring in the project area have been allowed under the USCG's discretionary authority implicit in 16 USC §1382. The USCG also cites regulations at 50 CFR 100.3(d), which they state exempt all military lands closed to access by the general public from the Federal Subsistence Management Program.

Response SOA 1

Thank you for your comment. Although the Federal Aviation Administration (FAA) does not concede that an Alaska National Interest Lands Conservation Act (ANILCA) Section 810 Subsistence Evaluation is legally required for this project, following the release of the Draft Environmental Impact Statement (DEIS) the FAA prepared a separate subsistence evaluation, one that is consistent with Section 810. The evaluation was released on February 28, 2013. Consistent with Section 810(b), the evaluation was the subject of a public comment period from February 28 to March 28, 2013, and was part of public hearings for the project held March 18, 2013 in Washington D.C. and March 21, 2013 in Kodiak, Alaska.

Comment SOA 2

[The Alaska National Interest Lands Conservation Act (ANILCA)]
We concur with the determination that Title XI applies to the proposed project but disagree that ANILCA Title VIII does not apply. ANILCA Section 303(1) expanded and re-designated the Alaska Maritime National Wildlife Refuge, including "…an undetermined quantity of submerged lands, if any, retained in Federal ownership at the time of statehood around Kodiak and Afognak Islands…" Title VIII of ANILCA applies to all public lands, which are defined in ANILCA Section 102(3) as "…lands situated in Alaska, which after the date of enactment of this Act, are Federal lands…." The Federal Subsistence Management Program regulations at 50 CFR 100.3(b)(1)(ii), which implement Title VIII of ANILCA, specifically indicate the regulations apply to the submerged lands in Womens Bay. The exemption for military lands in 50 CFR 100.3(d) cited by the USCG applies only to lands not previously addressed in 100.3(a)-(c) (i.e. Womens Bay) and which, according to the regulation's preamble, are "not part of a conservation system unit." (69 FR 70942, Dec. 8, 2004)

Further, Womens Bay is specifically described in 100.3(b) as "public lands," whereas the preamble for 100.3(d) notes that exempted "military lands….are not considered 'public' lands." (69 FR 70942) In addition, the 1988 Comprehensive Conservation Plan for the Alaska Maritime National Wildlife Refuge did not reference any exceptions under ANILCA for the USCG lands and included an ANILCA Section 810 Analysis for the Gulf of Alaska Unit, which includes Womens Bay.

We therefore request the FAA follow the requirements in ANILCA Section 810 for the proposed project, including notice and hearing requirements in Section 810(b).

Response SOA 2

Thank you for your comment. Although the Federal Aviation Administration (FAA) does not concede that an Alaska National Interest Lands Conservation Act (ANILCA) Section 810 subsistence evaluation is legally required for this project, following the release of the Draft Environmental Impact Statement (DEIS) the FAA prepared a separate subsistence evaluation, one that is consistent with Section 810. The evaluation was released on February 28, 2013. Consistent with Section 810(b), the evaluation was the subject of a public comment period from February 28 to March 28, 2013, and was part of public hearings for the project held March 18, 2013 in Washington D.C. and March 21, 2013 in Kodiak, Alaska.

Comment SOA 3

[Summary – Fish and Invertebrates]
The draft EIS, page 20 states, "At the landscape scale, Runway 07/25 Alternative 2 (Preferred Alternative) would have major impacts to sockeye salmon and Dolly Varden…" Please clarify whether the physical boundaries of the landscape scale is limited to Womens Bay or if it also includes Chiniak Bay.

Response SOA 3

Thank you for your comment. As described in Section 4.5.3 and Figure 4.5-2 of the Final Environmental Impact Statement (FEIS), the Landscape Area consists of the nearshore marine waters of Chiniak Bay between Spruce Cape and Cape Chiniak, including its sub-bays: St. Paul Harbor, Womens Bay, Middle Bay, and Kalsin Bay. The reference to the landscape area in the Executive Summary of the FEIS has been updated to include the full description.

Comment SOA 4

[Chapter 1: Purpose and Need, 1.5.2 Cost and Funding]
The DEIS states, "…the FAA has developed guidance that helps to define the maximum feasible cost for RSA projects (FAA 2004). Using this guidance, and considering local and regional factors, the FAA has determined that the maximum feasible cost of RSA improvements for Kodiak Airport is approximately $25 million for Runway 07/25 and approximately $25 million for Runway 18/36."

The FAA Financial Feasibility and Equivalency of RSA Improvements and EMAS, used as a tool to determine the costs analysis of meeting the RSA standard using EMAS for the Kodiak Airport, does not discuss other costs associated with determining the maximum feasible cost of each runway. We recommend that the FEIS discuss the projected costs of all aspects of the project, not just the cost of installing EMAS. The $25 million amount limits the potential range of alternatives and eliminates some alternatives that may avoid or minimize impacts. A table with the projected costs associated with construction of both runways would be useful in reviewing the cost estimates for each alternative.

Response SOA 4

Thank you for your comment. Federal Aviation Administration (FAA) Order 5200.9, *Financial Feasibility and Equivalency of Runway Safety Area Improvements and Engineered Material Arresting Systems*, provides guidance for comparing various runway safety area improvement alternatives with improvements that use Engineered Material Arresting Systems (EMAS), and determining the maximum financially feasible cost for Runway Safety Area (RSA) improvements, whether they involve EMAS or not.

Cost estimates were prepared for each alternative and included design, materials, construction, and other associated expenses. Life cycle costs were used to compare EMAS with non-EMAS alternatives and accounted for periodic inspections, maintenance, and replacement of the EMAS material.

As explained in Chapter 1 of the Final Environmental Impact Statement (FEIS), the purpose of this project is to improve the RSAs for Runways 07/25 and 18/36 to meet the FAA's RSA standards to the extent practicable. The maximum feasible cost of $25 million, determined by the FAA in accordance with FAA Order 5200.9, *Financial Feasibility and Equivalency of Runway Safety Area Improvements and Engineered Material Arresting Systems*, is relevant to the practicability of alternatives. The FAA analyzed a range of practicable alternatives and identified as its preferred alternatives those that would minimize environmental impacts while still meeting the project's purpose and need.

The costs associated with meeting standard RSAs are described in the FEIS Chapter 2, Alternatives. The costs of meeting full standards through grade and fill alternatives are outlined on page 2-7 of the FEIS. The costs of the feasible alternatives (including both EMAS and non-EMAS alternatives) are outlined in Section 2.4, Alternatives Carried Forward for Further Evaluation. The costs of these alternatives have been added to Table 2-2, Initial Range of Alternatives Summary.

Comment SOA 5

[Chapter 2: Alternatives, 2.4.1 Runway 07/25 RSA Alternatives]
The 2009 Preliminary DEIS Alternative 3 proposed to extend Runway 25 RSA landmass 425 feet and install 70-knot EMAS to provide stopping capability for the runway's design aircraft. We recommend that the FEIS discuss why Alternative 3 proposed in the Preliminary DEIS is not feasible and was not brought forward in the DEIS. The reduced fill footprint would reduce the biological impacts and subsistence impacts of the project by reducing the amount of fill into waters of the U.S. The projected cost for Alternative 3 in 2009 dollars was $30 million, based on a 4:1 fill slope. The proposed alternatives in the DEIS will be built on the 2:1 fill slope. If Alternative 3 was designed with the same specifications, it may reduce the installation costs below $25 million.

Response SOA 5

Thank you for your comment. The 2009 Preliminary Draft Environmental Impact Statement (PDEIS) that was reviewed by cooperating and coordinating agencies included an alternative for Runway 07/25 (PDEIS Alternative 3) that, after further evaluation, was determined to not improve the Runway Safety Area (RSA) to the extent practicable and therefore did not meet the project's purpose and need. The two build alternatives for Runway 07/25 included in the Draft Environmental Impact Statement (DEIS) and Final Environmental Impact Statement (FEIS) (Runway 07/25 Alternatives 2 and 3) both meet the project's purpose and need.

FEIS Chapter 2, Section 2.3, provides a description of the factors considered when developing alternatives for Runway 07/25 and Runway 18/36, including runway end use and aircraft types using each of the runways. Runway 07/25 is the primary runway for Kodiak Airport and the Alaska Airlines Boeing 737-400 aircraft, which is the design aircraft for the Runway 07/25 RSA, and which primarily uses Runway end 25 for arrivals and Runway end 07 for departures. As such, the RSA beyond Runway end 25 is important for enhancing safety for aircraft operations at the airport. As explained in Chapter 2 of the FEIS, it is not feasible to improve the RSA beyond Runway end 07. However, the FAA has determined that it is practicable to meet the FAA's RSA standards for both overrun and undershoot protection beyond Runway end 25. Therefore, any alternative that would not meet those standards, like Alternative 3 in the PDEIS, would not meet the project's purpose and need.

For Runway 18/36, unlike Runway 07/25, it is feasible to improve the RSA at both ends of the runway. Runway 18/36 is used by a variety of aircraft types in both directions and the FAA has determined that for both runway ends it is practicable to meet the RSA standard for both overrun and undershoot protection for the smaller aircraft that use the runway most often (i.e., 240 feet). Thus, alternatives that would not provide at least 240 feet of RSA beyond both runway ends for Runway 18/36 would not improve the RSA to the extent practicable and therefore would not meet the project's purpose and need.

Comment SOA 6
[Chapter 3: Affected Environment, 3.2 Land Use]
Please refer to the 4th paragraph, 3rd sentence. This sentence truncates the purposes of the Alaska Maritime National Wildlife Refuge. We request a revision that reflects all refuge purposes established by ANILCA Section 303(1)(B)(i-v).

Response SOA 6
Thank you for your comment. Consistent with this comment, the text in the Final Environmental Impact Statement (FEIS) was revised to include all refuge purposes according to Alaska National Interest Lands Conservation Act (ANILCA) Sec 303(1)(B)(i-v).

Comment SOA 7
[Chapter 4: Environmental Consequences]
Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (PPNEPA), 40 CFR Part 1502.24, "Methodology and Scientific Accuracy," state, "Agencies shall insure the professional integrity, including scientific integrity, of the discussions and analysis in environmental impact statements." The scientific integrity of the Freshwater and Marine Ecology Technical Report for Kodiak Airport Environmental Impact Statement, Kodiak, Alaska, as prepared by SWCA Environmental Consultants (2009 Technical Report), appears to meet this standard as required by the Act. However, the fisheries sampling periods of September 10-12, 2007, and June 17-20, 2008, do not provide adequate data to support the DEIS's determination that impacts to pink, chum and coho salmon in the landscape area are minor. In addition, the impact severity comparisons do not discuss the indirect effects on a landscape scale. Indirect effects are multi-layered and include the effects to subsistence, commercial and sport fisheries. The FEIS needs to define the individual effects on a landscape scale. "Significant impacts to fisheries resources" and "Significant impacts to salmonids" were referred to several times in the text and tables. We recommend the FEIS explain the meaning of "significant impacts" quantitatively to the reader as it is defined in PPNEPA, 40 CFR Part 1508.27, "Significantly."

Response SOA 7
Thank you for your comment. The sampling periods as presented in the technical report were designed to assess and survey habitats in the project and landscape areas. These surveys were not designed to assess fish populations but were intended to assess presence of aquatic species in potential habitats. Because the purpose of the surveys was to examine habitat, not to do specific species-related population counts, the length of the surveys was appropriate and effective to achieve the desired purpose.

The assessment in the Final Environmental Impact Statement (DEIS) that impacts to pink, chum, and coho salmon in the landscape area are minor is based on the effects to habitat from placement of fill compared to the amount of habitat in the entire landscape area, not on results of fish sampling during field studies.

Within the landscape area, there are many other rivers and streams with freshwater influenced saltwater habitat that support pink chum, and coho salmon populations. As such, the habitat provided at Runway ends 25 and 36 are not unique habitat for pink, chum, and coho salmon in the landscape area. Because of the quality and quantity of habitat for pink, chum, and coho salmon in the landscape area, effects to those species on the landscape level likely would not be measureable at the landscape scale.

In contrast, landscape effects to sockeye would be considered significant, since conditions for sockeye salmon in the Buskin River basin are unique in Chiniak Bay. The Buskin system provides habitat that is not available in other areas of the bay. Section 4.5 of the Final Environmental Impact Statement (FEIS) evaluated effects to habitat from placement of fill for the runway safety areas. It is estimated that the amount of available habitat lost or altered by project actions would correspond to decreases in juvenile salmonids and subsequently, adult populations. Populations of salmonids can be affected by many variables between the juvenile and adult stages. Most of these effects are outside the control of humans and many are not fully understood. As a result, it is not possible to quantitatively assess project effects to salmon populations. By using habitat to assess project effects to salmonids, we are able to quantify the habitat lost or altered compared to current available habitat in the project area. Population effects to salmonids are described qualitatively, and because of the high degree of uncertainty in project effects to populations, the effects were evaluated conservatively to fully disclose potential adverse impacts.

The indirect effects to fisheries and their severity are summarized in Table 4.5-1 in the Final Environmental Impact Statement (FEIS). Indirect effects to fisheries that may also impact subsistence, commercial (Section 4.10), and sport fisheries (Sections 4.10 and 4.14) are described in those applicable resource sections of the FEIS.

Comment SOA 8

[Chapter 4: Environmental Consequences, 4.5.1 Summary]
The DEIS states, “At the landscape scale, Runway 18/36 Alternatives 2 through 6 as well as Runway 07/25 Alternatives 2 and 3 would have major impacts to sockeye and Dolly Varden because the Buskin River basin is an essential and unique habitat for those populations, and the habitat loss would also effect [sic] one of the primary food source for sockeye salmon, Pacific sand lance. Effects to other salmonids at the landscape scale would be minor for all Build Alternatives because other Chiniak Bay stream basins produce populations of these species that contribute to the overall salmonid populations in the bay.” Please clarify what study determined Pacific sand lance is a primary food source for the Buskin River sockeye stock. We recommend the FEIS provide more information on how this minor effect on other salmonids was determined. The reduction of pink, chum and coho salmon populations in the Buskin River, combined with natural fluctuations of populations in other Chiniak Bay streams, may be a significant impact.

Response SOA 8

Thank you for your comment. As cited in the Environmental Impact Statement (EIS), Robards et al. 1999 and Groot et al. 1995, documented that sand lance are a food source for sockeye. There are no data that are specific to Buskin River sockeye diets and thus data from numerous other sockeye stocks (as summarized in the cited works) were used. The wording in the Final Environmental Impact Statement (FEIS) has been revised from "primary food source" to "food source" to further clarify this.

Fish sampling confirmed the presence of specific species in the project area, and then assumptions (laid out in the EIS, and supported by existing literature) were made that habitat conditions are suitable for pink and chum in many streams in the landscape area. Thus, Runway ends 25 and 36 are not unique for pink and chum in the landscape area, and effects to those species likely would not be measureable at the landscape scale. In contrast, effects to sockeye would be measureable, since the Buskin River basin is unique for sockeye in Chiniak Bay and provides habitat that is not available in other areas of the Bay.

Natural fluctuations of populations throughout Chiniak Bay could occur regardless of the proposed project and thus were not evaluated in the EIS. The potential combined effect of natural variation in other Chiniak Bay stocks and project-related reductions in Buskin River stocks would likely not have a landscape level effect on pink and chum salmon since they occur in nearly every low-gradient stream basin in Chiniak Bay. Kodiak Island escapement in 2011 for pinks was estimated at 2,780,208, and 422,130 for chum. Even considering natural variation in runs, these numbers of fish and the species' ubiquitous presence in numerous streams in the landscape area would buffer effects from Buskin River stocks to Chiniak Bay as a whole.

Comment SOA 9

[Chapter 4: Environmental Consequences, 4.5.2 Analysis Methods]
The DEIS states, “Environmental consequences to freshwater and marine fish and invertebrates species were determined by first documenting the existing conditions of the aquatic environment and then assessing how those conditions may change as a result of proposed RSA development.” The 2009 Technical Report discusses the use of SCUBA in May 2008 to conduct visual estimates of fish, crabs and canopy kelp along two transects at the end of Runway 25 and two transects at the end of Runway 36. The report does not discuss what species of fish were observed during the sampling effort. The report indicates the survey was conducted in May 2008, but does not indicate how many days samples were collected along each transect. The report provides little information about what species of fish and invertebrates are present in the proposed runway fill areas. These details should be included.

We recommend that additional fish and invertebrate sampling be conducted in the marine waters that will be impacted by the two proposed RSA improvement projects. Construction in marine waters is anticipated to begin in 2014 by constructing one RSA in 2014 and constructing the other RSA in 2015. We request the RSA on runway end 36 be constructed first. This will provide an additional two years of fish and invertebrates data to be collected on runway end 25, which provides significant habitat to fish and invertebrate species. Additional information of species composition and abundance will provide an improved projection of the impacts to fish and invertebrate species. The additional fish and invertebrate data can be used by the U.S. Army Corps of Engineers (COE) to make a more informed decision when determining compensatory mitigation required for the proposed fill in marine waters.

Response SOA 9

Thank you for your comment. The 2009 Freshwater and Maine Ecology Technical Report (see Terrestrial and Marine Wildlife Appendix) describes the purpose and methods for the SCUBA surveys that were conducted from March 13-April 1, 2008, which were primarily to characterize habitats in the project area. These surveys were not intended to conclusively determine the presence of species in the project area. Because species distribution and population numbers are constantly changing and affected by numerous variables (some of which remain unknown), numerous sampling seasons, years, methods, and parameters would be required to accurately capture quantitative information on species in the project area. Habitats are far more stable, not mobile, and have fewer constantly changing variables that affect their distribution and quantification. Therefore, mapping and quantifying habitats and assuming species presence due to documented presence and distribution in similar habitats is the most reliable and conservative method for assessing impacts to mobile aquatic species.

Additionally, fish sampling to assess presence of species in available habitats occurred from September 10-12, 2007 and from June 16-21, 2008. Tables 3-1 and 3-2 in the Freshwater and Maine Ecology Technical Report list species documented during these fish sampling periods. These data help supplement and validate some of the habitat data to show that the mapped habitat was suitable for salmonids. A variety of salmonids were documented in the project area, therefore the presence of species data were used to validate assumptions on habitat usage by salmonids and other fish species.

No additional species or habitat studies are planned for the Environmental Impact Statement (EIS) review and assessment process. The habitat and fish sampling surveys provide sufficient information for the Federal Aviation Administration (FAA) to identify and disclose potential effects from the preferred alternatives. Section 4.5 of the Final Environmental Impact Statement (FEIS) evaluated effects to habitat from placement of fill for the runway safety areas. It is estimated that the amount of available habitat lost or altered by project actions would correspond to decreases in juvenile salmonids and subsequently, adult populations. Populations of salmonids can be affected by thousands of variables between the juvenile and adult stages.

Most of these effects are outside the control of humans and many are not fully understood. As a result, it is not possible to quantitatively assess project effects to salmon populations. By using habitat to assess project effects to salmonids, we are able to quantify the habitat lost or altered compared to current available habitat in the project area. Population effects to salmonids are described qualitatively, and because of the high degree of uncertainty in project effects to populations, the effects were evaluated conservatively to fully disclose potential adverse impacts.

The appropriateness of pre- and post-construction biological surveys conducted after the EIS process is completed has been coordinated with stakeholders, including the Alaska Department of Fish and Game (ADF&G), the National Oceanic Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS), the U.S. Fish and Wildlife Service (USFWS), the Environmental Protection Agency (EPA), the U.S. Army Corps of Engineers (ACOE), and tribal governments, and was considered with the mitigation planning. Chapter 6, Mitigation, in the Environmental Impact Statement has been revised to describe more fully the proposed mitigation plan for the project.

Comment SOA 10

[Chapter 4: Environmental Consequences, 4.5.4.1 Impacts from Runway 07/25 RSA Alternatives]
The DEIS states, “Both Runway 07/25 build alternatives could result in major, significant, long-term impacts to marine habitats, functions, and fish and invertebrate species, including major impacts to juvenile salmonid rearing and foraging habitat for stocks other than steelhead from the Buskin River, and major impact to salmonid prey species.” The DEIS does not state why steelhead from the Buskin River were excluded in this determination of major impacts to juvenile salmonid rearing and foraging habitat. Please provide the data to support this statement.

Response SOA 10

Thank you for your comment. As stated in the Draft Environmental Impact Statement (DEIS) in Section 4.5.3, though little information is available on the migration of steelhead in the Buskin River, juvenile steelhead typically migrate rapidly through estuaries and the nearshore marine environment to spend their marine residence off-shore (Quinn 2005). They are not documented to extensively use the estuary or immediate nearshore area and therefore would be less impacted by the proposed project than would other species that rely heavily on these habitats.

Comment SOA 11

[Chapter 4: Environmental Consequences, 4.11.1 Subsistence Resources and Uses Page 4.11-13, Figure 4.11-1]
To better disclose the runway alternative’s impacts on subsistence fishing, we recommend updating this figure so it depicts the runway alternatives. We recommend using this new figure in Section 4.11.4.1 and 4.9.4.2. In addition, Section 4.9.4.2 should probably be revised as Section 4.11.4.2.

Response SOA 11
Thank you for your comment. Consistent with this comment, Figure 4.11-1 has been updated to include the footprint of the Preferred Alternatives for context and the Section 4.9.4.2 has been updated to Section 4.11.4.2 to correct the numbering.

Comment SOA 12
[Chapter 4: Environmental Consequences, Page 4.11-15, 1st Paragraph, 2nd Sentence] As written, this sentence is confusing. We suggest the following revision:
"In 2008 and 2009, because of the decline in sockeye escapement in the Buskin River ~~was so low~~, the Buskin River sockeye salmon sport fishery was closed by mid-June."

Response SOA 12
Thank you for your comment. Consistent with this comment, the Final Environmental Impact Statement (FEIS) has been revised as suggested.

Comment SOA 13
[Chapter 4: Environmental Consequences,
4.13.4 Environmental Consequences of the Alternatives] Subsistence Impacts: This paragraph includes data regarding the use of the Buskin River by residents of the City of Kodiak and the USCG Base. This paragraph does not include citations of where the data are from, however we recognize it is data from the ADF&G. Table 4.10-3 is the only reference to ADF&G subsistence harvest data and includes data from 1991. The ADF&G Division of Subsistence conducted comprehensive subsistence harvest surveys in the City of Kodiak, most recently for study years 1991, 1992, and 1993. The survey data for these years are available to the public on the Community Subsistence Information System (CSIS) database. These data should be used and appropriately referenced in the FEIS.

On page 4.10-21, under "Subsistence Impacts," all salmon harvest data are referred to in terms of an average. And, in terms of an average, the DEIS states, "the economic impact [on subsistence users] would not be significant." Given the population of the City of Kodiak, it is quite possible that, when spread across the population, the economic impacts felt by each individual would not be significant. However, please consider that if those same pounds of salmon are spread across the families who reside near the Buskin River, or who otherwise use the Buskin River on a regular basis, the economic impacts may be significant if the Buskin River is their only source of subsistence salmon.

Furthermore, on page 4.10-21, the DEIS states, "….although there would be a long-term economic impact on subsistence users, this economic impact would not be significant." This statement cannot be substantiated when the data are presented as averages.

The economic significance for households in close proximity to the Buskin River and others who utilize the subsistence resources from this river will be far greater than for 'average' households located throughout the area covered by the City of Kodiak.

Response SOA 13

Thank you for your comment. Consistent with this comment, the Final Environmental Impact Statement (FEIS) has been updated to include the appropriate citation from the Alaska Department of Fish and Game (ADF&G) Community Subsistence Information System (CSIS). The subsistence harvest information for 1991, 1992, and 1993 has been obtained and the FEIS has been updated to reference the data.

Section 4.10 of the FEIS describes that overall, there would not be a significant adverse economic impact to subsistence uses resulting from the proposed project because it would not affect incomes, shifts in population, and changes to employment opportunities. However, as noted in the Environmental Justice discussion within the section, there may be a higher impact on low-income populations due to the potential decrease in subsistence resource availability and the resultant need to obtain comparable food through purchase or other means. The proximity to the Buskin River in relation to other subsistence gathering areas is also related to the economic resources available to drive or boat to other locations to obtain subsistence resources. Lower-income individuals would likely have fewer resources to travel further to obtain comparable resources, therefore potentially resulting in a higher impact on those low-income populations.

Data that differentiates Buskin River subsistence users and their harvest amounts based on their socioeconomic level is not available. However, as stated in Section 4.11, Subsistence, the ADF&G Community Profile Database records indicate that 99 percent of City of Kodiak households and 100 percent of the United States Coast Guard (USCG) Base households use subsistence resources (Brown 2001). Further, a study in 2007-2008 found that 92-98% of subsistence users utilize the Buskin River for harvest. Between 54-56% of users also harvested fish in other areas. Because the majority of households in Kodiak (99 percent) are subsistence users, and a large percentage of those users (92-98%) use the Buskin River, average pounds per capita represents the best data available to analyze potential effects. While the amount of reduction per capita by socioeconomic level cannot be predicted, it is likely that any reduction in salmonid populations in the Buskin River would have a higher effect on low-income populations because it would be more difficult to supplement any reduction with comparable food through purchase or other means.

Comment SOA 14
[Chapter 4: Environmental Consequences, 4.13.4 Environmental Consequences of the Alternatives]
The sections entitled “Cultural Resources and Traditional Activities” and Section 4.11, “Subsistence,” both provide a good overview and accurate portrayal of the critical role that salmon plays in the culture and way of life of the peoples of Kodiak who live along the road system.

Response SOA 14
Thank you for your comment.

Comment SOA 15
[Chapter 6: Mitigation, 6.6 Compensatory Mitigation]
The DEIS states, “Compensatory mitigation is a method for offsetting impacts that cannot be avoided or minimized. These offsets may take many forms, such as replacement of habitat types lost, preservation or [sic] other habitats at risk, or even funding to support local or area mitigation needs.” The DEIS indicates the ADOT&PF may use a conceptual planning process as a basis for a final compensatory mitigation plan. This section does not describe the Compensatory Mitigation Rule (see 73 FR 19594-705, Apr. 10, 2008) that is used for compensatory mitigation. At a minimum, the FEIS should discuss the three methods used to accomplish compensatory mitigation:

1. Mitigation Banks: whereby a permit applicant may obtain credits from a mitigation bank. A mitigation bank is a wetland, stream or other aquatic resource area that has been restored, established, enhanced or preserved. This resource area is then set aside to compensate for future impacts to aquatic resources resulting from permitted activities. The value of a bank is determined by quantifying the aquatic resource functions restored, established, enhanced and/or preserved in terms of “credits.” Permittees, upon regulatory agency approval, can acquire these credits to satisfy compensatory mitigation requirements.

2. In-Lieu Fee Mitigation: whereby a permit applicant may make a payment to an in-lieu fee program that will conduct wetland, stream or other aquatic resource restoration, creation, enhancement or preservation activities. In-lieu fee programs are generally administered by government agencies or non-profit organizations that have established an agreement with the regulatory agency to use in-lieu fee payments collected from permit applicants.

3. Permittee-Responsible Mitigation: whereby a permittee may be required to mitigate through an aquatic resource restoration, establishment, enhancement and/or preservation activity. The compensatory mitigation may be provided at or adjacent to the impact site or at another location, usually within the same watershed as the permitted area. The permittee retains some responsibility for the implementation and success of the mitigation project.

Response SOA 15
Thank you for your comment. Chapter 6 in the DEIS ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe more fully the proposed mitigation plan for this project. That chapter includes a description of the applicable regulatory framework, including the compensatory mitigation regulations of the ACOE and the EPA (33 CFR part 332 and 40 CFR part 230, subpart J). The chapter explains how the proposed mitigation plan relates to the compensatory mitigation regulations and why in-lieu fee mitigation was selected for this project.

Comment SOA 16
[Chapter 6: Mitigation, 6.6 Compensatory Mitigation]
The conceptual planning process as discussed in Section 6.7, "Outline for a Conceptual Compensatory Mitigation Plan," does not discuss how this plan is relevant to the Compensatory Mitigation Rule. Section 6.6 should disclose the preferred method of compensation through the Compensatory Mitigation Rule to the loss of waters of the U.S. and state why the other options would not be used.

Response SOA 16
Thank you for your comment. Chapter 6 in the Draft Environmental Impact Statement (DEIS) ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe more fully the proposed mitigation plan for this project. That chapter includes a description of the applicable regulatory framework, including the compensatory mitigation regulations of the ACOE and the EPA (33 CFR part 332 and 40 CFR part 230, subpart J). The chapter explains how the proposed mitigation plan relates to the compensatory mitigation regulations and why in-lieu fee mitigation was selected for this project.

Comment SOA 17
[Chapter 6: Mitigation, 6.6 Compensatory Mitigation]
During November 13 and 15, 2012, DEIS meetings hosted by the FAA and ADOT&PF and attended by Kodiak area tribal governments and state and federal agencies, the FAA stated that ADOT&PF has proposed In-Lieu Fee Mitigation as the preferred method for satisfying compensatory mitigation requirements. It was also disclosed that the in-lieu fee program administrator might not use the fund for restoration of a wetland, stream or other aquatic resource in the Kodiak area. The October 19, 2012, COE Special Public Notice for the availability of the DEIS indicates the ADOT&PF has proposed In-Lieu Fee Mitigation at a 2:1 ratio.

We recommend Permittee-Responsible Mitigation be used to satisfy the compensatory mitigation requirement and request mitigation first be considered within the area of impact. For instance, Permittee-Responsible Mitigation may be used to replace culverts owned by ADOT&PF in the landscape area that currently do not provide fish passage.

The culverts will be replaced with structures that are approved by ADF&G and will be designed and installed to provide unrestricted fish passage. ADF&G culvert surveys that have been conducted within ADOT&PF right-of-ways located in the landscape area have identified six culverts on the Saltery Cove Road, four culverts on the Chiniak Highway and one culvert on the Anton Larson Bay Road that currently do not meet fish passage criteria.

Response SOA 17

Thank you for your comment. Chapter 6 in the Draft Environmental Impact Statement (DEIS) ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe in more detail the proposed mitigation plan for this project. That chapter addresses specific mitigation options, including culvert replacement. As described in that chapter, compensatory mitigation would be provided through an in-lieu fee (ILF) payment at a 5.5:1 ratio, and an additional payment would be made to ADF&G for its subsistence management program on the Buskin River. Permittee-responsible mitigation would not be used. For more information on mitigation, please see Chapter 6 of the FEIS.

Comment SOA 18

[Chapter 6: Mitigation, 6.6 Compensatory Mitigation]
Additionally, we recommend that mitigation help support projects that will be administered by ADF&G. Projects may include:

- A proposed enhancement project in the landscape area to provide increased recreational and subsistence opportunities for sockeye salmon production.
- Operate adult salmon enumeration weir in the Buskin River for ten years (two sockeye salmon life cycles) to evaluate short term and long term effects to the river's salmon runs.
- Conduct a migratory study on sockeye salmon smolt out-migrating from the Buskin River to the ocean by inserting a miniature transmitter into sockeye salmon smolt at the Buskin Lake outlet. Smolt collected at the lake outlet will be tracked traveling down the Buskin River and out into the saltwater to monitor their migration route in the project area. If the feasibility study is successful, tag smolt for five years before, during and after the safety improvements are made.

Response SOA 18

Thank you for your comment. Chapter 6 in the Draft Environmental Impact Statement (DEIS) ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe in more detail the proposed mitigation plan for this project. That chapter includes discussion of specific mitigation options, including those suggested by the commenter. Under the mitigation plan, compensatory mitigation would be provided through an in-lieu fee (ILF) payment at a 5.5:1 ratio, and an additional payment would be made to ADF&G for its subsistence management program on the Buskin River (to be used either to continue the current adult escapement monitoring program or to develop a smolt enumeration study). For more information, please see Chapter 6 of the FEIS.

Comment SOA 19
[Appendix, 3.1 Salmon Essential Fish Habitat]
The DEFHA states, “Freshwater EFH for salmonids occur in the Buskin River. The Buskin River and its tributaries are identified as important freshwater spawning areas for chum, coho, pink, and sockeye salmon.” “Further, Buskin Lake, Lake Louise, and Lake Catherine are listed as important spawning waters for coho and sockeye salmon in the ADF&G’s Catalog of Waters Important for Spawning, Rearing, or Migration of Anadromous Fishes (ADF&G 2012).” The ADF&G’s Catalog of Waters Important for Spawning, Rearing, or Migration of Anadromous Fishes also indicates that steelhead spawn and rear in the Buskin River and Dolly Varden are present and rear in the Buskin River. Please revise the DEFHA to include steelhead spawning and rearing in the Buskin River and Dolly Varden presence and rearing in the Buskin River.

Response SOA 19
Thank you for your comment. Dolly Varden and steelhead do not have designated essential fish habitat and are not regulated by the Magnuson-Stevens Act (MSA). The only species included in the Essential Fish Habitat Assessment (EFHA) are those with federally designated essential fish habitat. Section 4.5 of both the Draft and Final Environmental Impact Statements (DEIS and FEIS) disclose the presence of and impacts to Dolly Varden and steelhead in the Buskin River Basin.

Response to NOAA – National Marine Fisheries Service
James W. Balsiger, Ph.D, Administrator, Alaska Region
December 17, 2012

Comment NOA 1
EFH has been designated in the project area (nearshore marine waters of Chiniak Bay) for coho, chum, pink, sockeye, and Chinook salmon, as well as walleye pollock, pacific cod, sablefish, flatfish, rockfish, Atka mackerel, skates, squid, sculpins, sharks, octopus, and forage fish. For both RSAs a total of 339,090 cubic yards of clean fill material will be placed in 17.8 acres of intertidal and subtidal marine EFH. The EFH Assessment, (DEIS, Appendix 5) states that the construction of the RSAs for runway 07/25 and runway 18/36 will adversely affect salmon and groundfish EFH. NMFS agrees with the Assessment.

Response NOA 1
Thank you for your comment.

Comment NOA 2

The EFH Assessment describes impacts to EFH for salmon and groundfish from the construction of the RSA for runway 7/25 due to the permanent loss of kelp and algal habitat, as well as shallow, freshwater-influenced habitat near the mouth of the Buskin River. These habitats function as nursery, foraging, and spawning grounds for a variety of fish and invertebrate species. In addition, changes to existing slopes and substrates, will displace juvenile salmon into lower quality habitats. Additionally, the EFH Assessment states that effects to EFH for salmon and groundfish from the construction of the RSA for runway 18/36 will be less pronounced due to the existing steep, armored shoreline, limited algal cover, and low habitat complexity. The Assessment further states that while there will be loss of EFH, biotic communities will likely remain similar to existing communities and displaced organisms will be expected to find suitable nearby habitat. This assumption fails to take into account the mechanisms that sustain these communities and the consequences that will result from the permanent loss of habitat as a result of the RSA for runway 18/36.

Response NOA 2

Thank you for your comment. Though there would be a loss of habitat, existing habitats and habitats created by the identified Preferred Alternative for Runway 18/36 (Runway 18/36 Alternative 7) would provide similar functions and would not be considerably different from what exists presently. The analysis in the Final Environmental Impact Statement (FEIS) (Section 4.5) and Essential Fish Habitat Assessment (EFHA) (see Appendix 5: Essential Fish Habitat Assessment) takes into account mechanisms that sustain these communities based on the best available information. There would be a loss of habitat associated with all alternatives for Runway 18/36, and the identified Preferred Alternative would result in an adverse impact to fisheries; however, the impact would be less pronounced when compared to all other alternatives for that runway because of the avoidance of impacts to areas closest to the Buskin River. The biotic communities at the base of Runway 18/36 have already been altered by human actions (existing rock armor, steep slopes, active runway end, limited algal cover, and low habitat complexity). The existing habitat is not unique to the project area or Chiniak Bay. The proposed function of the new habitat would be similar to the function of the existing habitat. Thus, the loss of approximately 9 acres of non-unique, previously-altered, armored habitat will likely not affect the biotic community's ability to sustain itself. Because the existing biotic communities can sustain themselves on the existing non-unique, previously-altered, armored habitat, it is expected that they should be able to sustain themselves on the new habitat with similar functions.

Comment NOA 3

Over the past five years, NMFS has worked closely with the FAA and ADOT&PF to reduce impacts to EFH, resulting in the proposed Preferred Alternatives. NMFS applauds the efforts of the FAA and ADOT&PF in developing avoidance and minimization measures.

Due to this early coordination, NMFS has no further comments on the alternatives listed in the DEIS or EFH assessment. However, these alternatives would still have adverse effects on living marine resources, including EFH, and appropriate compensation should be identified.

Response NOA 3
Thank you for your comment. Chapter 6 of the Draft Environmental Impact Statement (DEIS) ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe more fully the proposed mitigation plan for this project, including compensatory mitigation.

Comment NOA 4
In order to compensate for unavoidable impacts to resources ADOT&PF has proposed a fee-in-lieu payment at a 2:1 ratio. This is inadequate to compensate for the permanent loss of nearly 18 acres of productive marine EFH in Chiniak Bay, much of it unique to the area. NMFS notes that other recent projects in Alaska that caused the loss of similar habitats, resulted in higher mitigation ratios (Unalaska Airport, 3:1; Cottonwood Bay, 5:1). NMFS also notes that no analysis has been provided to justify the 2:1 ratio, giving the appearance that this amount was arbitrarily selected.

Response NOA 4
Thank you for your comment. Chapter 6 in the Draft Environmental Impact Statement (DEIS) ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe in more detail the proposed mitigation plan for this project. As described in that chapter, the mitigation plan would include an in-lieu fee payment at a 5.5:1 ratio. The basis for this ratio is explained in Chapter 6 of the FEIS.

Comment NOA 5
Clear processes for calculating mitigation are available. The Anchorage Debit-Credit Method, part of the Anchorage Wetlands Management Plan, is one such process where the Environmental Protection Agency, the Corps of Engineers, and the Municipality of Anchorage have developed a methodology to calculate debits and credits for use in fee-in-lieu programs. The Port of Anchorage Expansion project is an example where this methodology was used to calculate compensation for 130 acres of intertidal and sub-tidal fill in Upper Cook Inlet; resulting in an assessed value of $8.8 million, or approximately $67,000 an acre. While NMFS understands this methodology was developed for Anchorage wetlands, the process could be adapted to determine mitigation values for the proposed project.

Response NOA 5
Thank you for your comment. Chapter 6 in the Draft Environmental Impact Statement (DEIS) ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe in more detail the proposed mitigation plan for this project. As described in that chapter, compensatory mitigation would be provided through an in-lieu fee (ILF) payment at a 5.5:1 ratio, and an additional payment would be made to ADF&G for its subsistence management program on the Buskin River. Please see Chapter 6 of the FEIS for further explanation of the basis for the mitigation plan.

Comment NOA 6
NMFS provides the following conservation recommendations pursuant Section 305(b)(4)(A) of the MSA.

1. NMFS recommends the FAA convene a meeting of interested resource agencies to develop mutually agreed upon mitigation to adequately compensate for the unavoidable impacts to the marine environment, including EFH. Further, we recommend that this mitigation package be included in the record of decision for the final Environmental Impact Statement.

Response NOA 6
Thank you for your comment. Since publication of the Draft Environmental Impact Statement (DEIS), the Federal Aviation Administration (FAA) and the Alaska Department of Transportation and Public Facilities (ADOT&PF) have coordinated with the Alaska Department of Fish and Game (ADF&G), National Oceanic Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS), U.S. Fish and Wildlife Service (USFWS), Environmental Protection Agency (EPA), U.S. Army Corps of Engineers (ACOE), and tribal governments regarding impacts to the marine environment and development of proposed mitigation. Chapter 6 in the Draft Environmental Impact Statement (DEIS) ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe more fully the proposed mitigation plan for this project. Specific mitigation commitments will be included in the Record of Decision.

Response to Native Village of Afognak
Melissa Borton, Tribal Administrator
December 17, 2012

Comment NVA 1
NVA has reviewed the DEIS and have a few comments we'd like to share with you. The DEIS for Runway Safety Areas (RSAs) at the Kodiak Airport improvements suggests Preferred Alternatives to create RSA areas off the east end of runway 25 (Alt.2) and the south end of runway 36 (alt.7) These alternatives involve the placement of fill material into intertidal waters of Chiniak Bay and will in fact impact the local marine environment, subsistence and the sport harvest of salmon.

Response NVA 1
Thank you for your comment. The impacts of fill material into intertidal waters of Chiniak Bay and impacts to the local marine environment, subsistence and the sport harvest of salmon are described within the Final Environmental Impact Statement (FEIS).

Comment NVA 2
These proposed alternatives are a compromise of community concerns for environmental impacts on area habitats and their impacts on subsistence users, while providing the greatest safety enhancement (within the $50 M threshold allocated by congress for the project). However, there are some changes and clarifications that should be addressed.

Response NVA 2
Thank you for your comment. The Preferred Alternatives were identified as those that met the project purpose and need while minimizing environmental impacts to the extent possible.

Comment NVA 3
Please note: that there are many ethnic groups who rely on subsistence, while as Natives our right to subsist is something that is inherent; we also recognize that other cultures throughout Kodiak subsist and we respect that. While nearly everyone relies on subsistence, it is particularly true of lower income folks. Subsistence harvest and sharing of natural wild foods is the tie that binds Kodiak's community. Some low income folks would be hard put to gather these species elsewhere.

Kodiak folks here are skeptical of the airport and effects on salmon, particularly reds (sockeye). Village elder Moses Malutin (deceased) noted that "after the military messed up the Buskin river (39/40?) there were hardly any reds for more than 25 years!" While we understand the need to implement safety measures, we also are concerned that further change in the Buskin River area may decimate our resources beyond repair.

Response NVA 3
Thank you for your comment. The Federal Aviation Administration (FAA) recognizes that subsistence resource harvest adjacent to the airport is very important to all user groups in Kodiak, including Native Alaskans. Specifically, Section 4.11 of the Final Environmental Impact Statement (FEIS) notes that nearly all rural Alaska communities depend on subsistence resources to meet at least part of their nutritional needs. The reasons for participating in subsistence are many and varied. Some individuals participate in subsistence activities to supplement personal income and provide needed food. To minimize effects to important subsistence resources, the FAA's Preferred Alternatives would not directly impact the Buskin River.

Section 4.10 of the FEIS describes how impacts to subsistence could affect take home resources for food and that the reduction in subsistence resources per capita would likely be felt to a larger extent by low-income populations because higher income populations could generally make up the difference in subsistence use through other resources (salary, etc.). Section 4.9, Historical, Architectural, Archaeological, and Cultural Resources, Section 4.10, Socioeconomic Impacts, Environmental Justice, and Children's Health and Safety Risks, and Section 4.11, Subsistence Resources and Uses, of the FEIS and the Subsistence Evaluation Appendix note the cultural and socioeconomic importance of subsistence resources to local residents, including the importance of sharing resources.

Section 4.5, Fish and Invertebrates, describes the impacts anticipated for salmon and other species in the Buskin River. Because significant impacts may result, the FAA and the Department of Transportation & Public Facilities (ADOT&PF) have coordinated with the appropriate regulatory agencies and tribal governments to develop compensatory mitigation for adverse effects to subsistence resources. For more details, please see Chapter 6 of the FEIS, which has been revised to describe the proposed mitigation plan for this project.

Comment NVA 4

The areas within the DEIS that discuss subsistence, please understand that there are many other species that we subsist on that aren't listed in the document.

Response NVA 4

Thank you for your comment. The Federal Aviation Administration (FAA) understands that there are many important species for subsistence uses. The Final Environmental Impact Statement (FEIS) does not list all species used for subsistence, but refers to the Subsistence Evaluation (Appendix 12 of the FEIS) that includes a full list of the common subsistence resources in the Kodiak area. Based on specific comments received during the Public Comment period for the evaluation, sea lion and sand lance have been added to the list of subsistence resources in the Subsistence Evaluation.

Comment NVA 5

Comments on the PDEIS and DEIS (at prior meetings) by tribes, local biologists and ADF&G and USFWS noted that there would be significant impacts to sockeye and coho smolt as well as out migrant dolly varden and steelhead from any extension of runway 25. The DEIS text mentions impacts only for pink and chum fry yet table 2-47 states 'Loss of Juvenile salmonid salmon foraging habitat… salmonid prey species habitat". This must be corrected.

Response NVA 5

Thank you for your comment. Effects to all salmonids, including (and described specifically) sockeye, coho, Dolly Varden, and Steelhead are specifically addressed in the Final Environmental Impact Statement (FEIS) in Section 4.5, Fish and Invertebrates. That section also specifies that all species mentioned in this comment use to some degree the habitat that would be filled, and all the species would be affected. Some of the species are more reliant on the impacted habitat than others and are therefore identified specifically.

Comment NVA 6

As mentioned previously your marine coastal process model which is the basis of the DEIS comment is seriously flawed. It was based on only 1 month of data from a single current array, almost 300 yards south, south east of the Buskin River, for the month of October 2007. It was an interesting academic approach but not a realistic representation of the dynamic nature for the mouth of the Buskin and the adjacent flats. An entire year would have been much more accurate. It is common local knowledge that currents (which control sediment/beach movement) fluctuate considerably in intensity and direction; dependent on the predominant winds. This is particularly true for winter months. This error was identified when the draft analysis was presented locally. It has been more the 5 years since the single array was set. Why weren't multiple arrays set near to the Buskin outlet for an entire year during that time?

Response NVA 6

Thank you for your comment. The coastal process model used to assist in the assessment of changes to hydrology and circulation was prepared using existing available data and was supplemented by field measurements. The purpose of the field measurements (four acoustic doppler current profilers placed throughout the area) was for verifying the model parameters and ensuring proper calibration. It is not needed to collect data for longer than the period used (approximately one month) to meet those needs. Additional field verification and monitoring would not have resulted in a measurable change to the model input or output variables such as wind speeds, tides, and currents.

Regarding sediment and beach movement, they are described within the Water Quality Appendix (Appendix 1 of the Final Environmental Impact Statement (FEIS)) in Appendix C of the Water Resources Technical Memorandum (referred to as the "HEC-RAS Existing and Proposed Conditions Model Technical Memorandum"). Section 2.7 of that document describes coastal geomorphology and longshore transport in the area. The modeling effort for the project included a review of bed shear stresses for various build out alternatives; however, the model does not predict beach movement or changes. As noted in the report, sediments are transported by waves and wave-generated currents. The sediment transport assessments were based partially on long-term wind records from the airport, but primarily on the beach and nearshore morphology, historic records, and observations.

These data show that the Buskin River mouth and delta are in a low energy wave environment and sediment transport is equally low. The barrier fronting the river and directed to the north shows no signs of recent breaching which would be common for a high-energy, high-transport environment. The direction of the Buskin River mouth indicates that the long-term sediment transport direction is northward. Occasionally, and for short durations, this direction is reversed, and more southern and easterly winds can cause the river's mouth to move a little to the south while piling up sediment on the north side of the mouth. When the storm subsides, the northward-directed transport would resume. Judging by past photography, the present river mouth location is in near equilibrium with the present transport forces and sediment supply. This process of minor north and south offsets of the river mouth would not be substantially altered by the proposed project.

Comment NVA 7

This document should differentiate between monitoring and mitigation:
An ongoing sockeye smolt monitoring program would measure the need for mitigation. If the "keystone species' for the Buskin is negatively affected what good is mitigation? Sockeye are the most utilized subsistence and sport harvest as well as a food source for bears, birds and other animals. What good is mitigation; [sic] be it applied to a remediation fund used stateside, increased parkland, enhancing other species, etc.? I believe that both the local ADF&G staff comments and local USFWS comments for the PDEIS agree on potential impacts to salmon other than pink and chum. I believe that an ongoing smolt monitoring should be done as a function of airport operations when the RSA for RW 36 is completed. If there is no monitoring then skip this extension that will most likely negatively impact salmon.

Response NVA 7

Thank you for your comment. Generally, mitigation is intended to avoid or offset adverse effects, whereas monitoring is intended to verify project impact assessments or mitigation effectiveness. Specific to this project, the need for mitigation is based upon the anticipated adverse impact to resources as described in the Final Environmental Impact Statement (FEIS). The appropriateness of pre- and post-construction monitoring conducted after the Environmental Impact Statement (EIS) process is completed has been coordinated with stakeholders including the Alaska Department of Fish and Game (ADF&G), the National Oceanic Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS), the U.S. Fish and Wildlife Service (USFWS), the Environmental Protection Agency (EPA), the U.S. Army Corps of Engineers (ACOE), and tribal governments, and was considered with the mitigation planning.

The Final Environmental Impact Statement (FEIS) notes that the proposed project could result in a reduction of salmonids in the Buskin River system. Data collection for the EIS was sufficient to determine the proposed project's effect on fisheries.

Monitoring of sockeye smolt may provide information on the smolt abundance post construction; however, it would not be possible to conclusively associate project effects to specific changes in population because of natural variability and other unknown variables.

However, because the FAA received several comments from the community requesting a smolt monitoring program during the EIS process, the mitigation plan described in Chapter 6 of the FEIS includes a payment of $200,000 to the ADF&G to fund their subsistence management program on the Buskin River. These funds would be used either to continue the adult escapement monitoring or to develop a smolt enumeration study. This management program would aid in the management of sustainability of salmon runs and provide information that could improve management of the river for subsistence users.

Comment NVA 8

During November 13 and 15, 2012, DEIS meetings the FAA stated, the ADOT&PF had proposed In-Lieu Fee as the preferred method for paying Compensatory Mitigation. It was also disclosed, the agency or non-profit that administers the In-Lieu Fee may not use the fund for restoration of a wetland, stream, or other aquatic resource in the Kodiak area. If mitigation funds go outside of Kodiak this would be atrocious. The Kodiak community will be the ones who have to live with the destruction/reduction of our resources; we should be the community that benefits from any mitigation. Please answer this question in the EIS. Perhaps this problem should be addressed to Alaska's congressional delegation for solution?

Response NVA 8

Thank you for your comment. Chapter 6 in the Draft Environmental Impact Statement (DEIS) ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe in more detail the proposed mitigation plan for this project. As described in that chapter, compensatory mitigation would be provided through an in-lieu fee (ILF) payment at a 5.5:1 ratio, and an additional payment would be made to ADF&G for its subsistence management program on the Buskin River. Please see Chapter 6 of the FEIS for further explanation of the basis for the mitigation plan.

Comment NVA 9

Runway 18/36 Alternative 7: This would extend Runway end 36 RSA landmass by 600 feet, shift runway south 240 feet and install 40 knot EMAS on the north end of Runway end 18 on the existing pavement. This seems to be a reasonable compromise that would diminish the environmental risks of extending the RSA over the spit at the mouth of the river to the north. While GPS programmed landings will need to be adjusted slightly there is much more room for the glide slope to the south then [sic] to the north.

Response NVA 9
Thank you for your comment. Runway 18/36 Alternative 7 meets the purpose and need for the proposed project while minimizing the environmental impacts. The Federal Aviation Administration (FAA) has identified Runway 18/36 Alternative 7 as the Preferred Alternative for that runway.

Comment NVA 10
In the western Gulf of Alaska our harsh winter marine environment is much more severe than Cordova and our airport is much closer to the ocean. Is Cordova a good test site for Kodiak? Operations and repair questions: Who pays for the repairs? (FAA, State, local community) Will the runway be closed after EMAS is activated in an emergency or if a snow-plow accidently runs on to it and breaks the surface? Who pays for the replacement when it reaches it [sic] lifespan of 10 years: (FAA, State, local community?) Would the 70 knot EMAS on RW25 be hazardous for shortfall approach from the east on to 25? If it should prove ineffective over time, then it should be removed and the runways hard paved and no further extension should occur on the west end of 7/25.

Response NVA 10
Thank you for your comment. The Federal Aviation Administration (FAA) has developed guidance concerning Engineered Materials Arresting System (EMAS) and its potential application in lieu of standard Runway Safety Areas (RSAs) (see FAA Order 5200.9, Financial Feasibility and Equivalency of Runway Safety Area (RSA)). After years of testing and analysis, the FAA has determined that EMAS can be constructed to provide a level of overrun safety generally equivalent to a standard RSA, including in environments with harsh weather conditions. According to the manufacturer of EMAS, the EMAS beds do not present a hazard to aircraft landing short on approach. The same level of undershoot protection is provided with or without EMAS. Testing of EMAS at sites across the country has helped the FAA with determining that EMAS is feasible in harsh environments such as those at Kodiak Airport.

The Alaska Department of Transportation and Public Facilities (ADOT&PF) is responsible for the operation and maintenance of the EMAS bed. If an aircraft or other equipment were to enter the EMAS beds resulting in a need to replace the EMAS blocks, the party responsible for the damage or ADOT&PF would be responsible for the costs of replacement.

Additionally, at the end of usable life, the replacement costs would be eligible for federal grant funding assistance similar to the funding expected to be used for its initial construction. If the EMAS is damaged due to an overrun or determined to be less than fully serviceable, the runway would not necessarily be closed but a Notice to Airmen (NOTAM) must be issued to alert airport users of the reduced performance of the EMAS. The FAA has found EMAS to be a good alternative to standard RSAs.

However, if the EMAS should prove ineffective over time, additional analysis would be conducted to determine the best possible solution if the EMAS ever needed to be removed.

Comment NVA 11
Again, we understand the need to implement safety measures; however, we don't believe that our valuable resources need to suffer at the same time.

Response NVA 11
Thank you for your comment. There are no feasible and prudent alternatives meeting the project's purpose and need that avoid the placement of fill into the coastal waters adjacent to Kodiak Airport. The Preferred Alternatives chosen by the Federal Aviation Administration (FAA) were identified to balance between the need to improve the Runway Safety Areas (RSAs) and the potential environmental impacts. The Preferred Alternatives meet the project's purpose and need while taking into account the potential associated environmental impacts by reducing fill toward the important Buskin River area to the extent possible consistent with the purpose and need.

Response to Sun'aq Tribe of Kodiak
Robert Polasky, Chief Executive Officer
December 17, 2012

Comment STK 1-1
The Sun'aq Tribe of Kodiak makes the following comments of record in regard to the 2012 Draft Kodiak Airport Extension Environmental Impact Statement. The Sun'aq Tribe of Kodiak is opposed to any action causing a loss of habitat that creates an area to be closed from the customary and traditional practices of subsistence use for its 1,641 tribal members.

Response STK 1-1
Thank you for your comment. The Federal Aviation Administration (FAA) acknowledges the Tribe's opposition to any undertaking that would result in loss of habitat and changes to customary and traditional practices. The Preferred Alternatives would result in the loss of marine and intertidal habitat, which could cause a reduction in subsistence harvest of certain species. The Preferred Alternatives would not result in closures of access to subsistence areas beyond those physically occupied by the runway and runway safety area surfaces, which would not be used for subsistence activities due to their developed nature.

Comment STK 1-2
It is difficult to be supportive of any loss of habitat that affects the wetland areas and marine environment caused by Kodiak Airport extensions. The area that is going to be filled to create an extension is removing habitat that nurtures many of the traditional species that are used as food and have been harvested in a customary and traditional practice by our tribal members now and for many centuries in the past. From the huge amounts of fill that are going to be placed into the area for the Kodiak Airport extensions the plants, migratory birds, fish, inner tidal invertebrates and marine mammals will be affected in a negative way.

Response STK 1-2
Thank you for your comment. The Federal Aviation Administration (FAA) recognizes that subsistence resource harvest adjacent to the airport is very important to all user groups in Kodiak. Section 4.9, Historical, Architectural, Archaeological, and Cultural Resources, Section 4.10, Socioeconomic Impacts, Environmental Justice, and Children's Health and Safety Risks, and Section 4.11, Subsistence Resources and Uses, of the FEIS and the Subsistence Evaluation Appendix (Appendix 12) note the cultural and socioeconomic importance of subsistence resources to local residents, including the importance of sharing resources. To minimize effects to important subsistence resources, the FAA's Preferred Alternatives would not directly impact the Buskin River. In addition, the FAA and Department of Transportation & Public Facilities (ADOT&PF) have coordinated with the appropriate regulatory agencies and tribal governments, including the Sun'aq Tribe of Kodiak, to develop compensatory mitigation to address effects to subsistence resources. Chapter 6 of the Draft Environmental Impact Statement (DEIS) ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe more fully the proposed mitigation plan for this project.

Comment STK 1-3
One very important item to note is that there will be a difference in the way the fresh water mixes with the saltwater from the Buskin River. There is a possibility that because the water mixture area changes from the fill it may affect the small salmon when they are transforming to be able to survive in the salt water and vise versus when the adult salmon returns from the ocean and changes to be able to survive in the fresh water. The significance of how important this area is cannot be explained by biologist [sic] because most do not really understand how critical this area is to survival during two times in the salmon life cycles, nor is there significant data in existence related to studying fish in the fresh and saltwater mixture environment.

Response STK 1-3
Thank you for your comment. The Final Environmental Impact Statement (FEIS) describes the importance of fresh water/salt water mixing areas for juvenile salmonids and the potential impacts resulting from changes to this mixing area.

Section 4.5, Fish and Invertebrates, states "Aquatic habitat at the Buskin River barrier bar (north of Runway end 18) is unique in Chiniak Bay and offers one of the few low-gradient, soft-bottom areas available to juvenile salmonids from the Buskin River. These species enter marine waters via the Buskin River freshwater plume and require a transitional rearing period during which they are dependent on areas reached by the plume. Loss of this habitat north of Runway end 18 would cause significant long term adverse effects to aquatic species and populations in the Buskin River area (Runway 18/36 Alternatives 2 through 6). Runway 7/25 Build Alternatives would significantly change the distribution of the Buskin River freshwater plume, also resulting in significant impacts."

Comment STK 1-4

This sort of major change in habitat could adversely affect the already traumatically declining Sea Lion population. The current Stellar Sea Lion population in the North Pacific has declined 90% from an abundance of over 400,000 in the 1950's to a diminishing population of 40,000 in 2010. Taking more habitat away from Sea Lions, by putting more fill into the marine environment with the airport runway extension will create more of a burden than is already on their struggle to survive. This extension could possibly be another man made burden upon them, with their competition for food from commercial fisherman and being predated upon [sic] by Killer Whales and draggers. The local Sea Lion herd population, which hauls out on a float in the harbor because their natural haul out was removed by a breakwater, is declining as well.

Response STK 1-4

Thank you for your comment. As stated in section 4.7 of the Final Environmental Impact Statement (FEIS), there is estimated to be 319 acres of critical sea lion habitat in the project area. The Preferred Alternatives would impact 5.4% of this habitat. This would not result in any significant adverse impacts to Steller sea lion, because individuals are likely to find abundant unaffected food resources within accessible travel distances from the project area and would not need to expend high amounts of energy to gain access to them.

The Federal Aviation Administration (FAA) has prepared a biological assessment for protected species, including the Steller sea lion. The FAA has found that the proposed action may affect, but is not likely to adversely affect, the Steller sea lion. The National Marine Fisheries Service (NMFS) has reviewed the FAA's finding and concurred in July 2013 (see Appendix 6, Biological Assessment Appendix).

Comment STK 1-5
From the Preferred Alternatives that have been selected, information was not made available in the EIS stating whether or not the end of the runways extended will cause the boundaries for the subsistence fishing at the mouth of the Buskin River to be moved farther away causing more of a closed area for acquiring in a customary and traditional practice area. The subsistence fishing area should not be moved out further from the existing area due to movement of the land mass from the fill being placed at the end of the runways. The Alaska National Interest Land observation [sic] Act, Title VII Subsistence references at Section 810 (a) & (b) "Subsistence and Land Use Decisions" and Section 816 (b) "Closure to Subsistence Uses" ... the Secretary to designate areas where, and establish periods when, no taking of fish and wildlife shall be permitted ... "

Response STK 1-5
Thank you for your comment. An Alaska National Interest Lands Conservation Act (ANILCA) Section 810 Subsistence evaluation has been prepared (see Subsistence Evaluation Appendix) which describes the possible effects to subsistence activities resulting from the proposed project. While the runway safety expansion would affect the location of the regulatory marker (a prominent rock that is used to identify the subsistence closure area around the mouth of the Buskin River), the Federal Aviation Administration (FAA) cannot implement subsistence regulations to ensure the subsistence boundaries would remain in place. Decisions regarding regulatory boundary adjustments for this area are the jurisdiction of the Federal Subsistence Board and the Alaska Board of Fisheries.

Comment STK 1-6
In a proactive look to the future, the Sun'aq Tribe of Kodiak has held Tribal Consultation with the Federal Aviation Administration (FAA). During the tribal consultation the discussion following the biological explanation from the FAA Marine Biologist was centered on a formal written request that was made by the Tribal Council Chairman for the Sun'aq Tribe of Kodiak's 1641 Members which related specifically to mitigation from the loss of wetland and marine habitat. The Sun'aq Tribe of Kodiak looks forward to working with the FAA to discuss a positive solution to the mitigation process to balance the habitat being lost to create some sort of enhancement for the tribal member's ability to acquire marine and wetland customary and traditional foods.

Response STK 1-6
Thank you for your comment.

Response to Sun'aq Tribe of Kodiak
December 05, 2012

Comment STK 2-1
In 1990, the U.S. Congress instructed the Army Corps of Engineers to pursue the goal of "no overall net loss" of the nation's remaining wetlands (Section 307 of the Water Resources Development Act).

In 1990 a Memorandum of Agreement between the Army Corps of Engineers and the Environmental Protection Agency EPA (Berry and Dennison 1993) establishes policy for the location of a mitigation project: the highest priority is given to on-site mitigation, but if off-site, the mitigation should be in close proximity to the impact area, such in the same watershed. Open Marine Salt Water Sub-tidal/Intertidal Marine wetlands include the open ocean overlying the continental shelf and the associated coastline, as well as other examples.

Mitigation is the restoration, enhancement, preservation, or creation of wetland functions lost through dredging or fill. Compliance may require that more acres be restored, enhanced, preserved, or created to compensate for the loss at the impacted wetlands.

Response STK 2-1
Thank you for your comment. Chapter 6 in the Draft Environmental Impact Statement (DEIS) ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe in more detail the proposed mitigation plan for this project. As described in that chapter, compensatory mitigation would be provided through an in-lieu fee (ILF) payment at a 5.5:1 ratio, and an additional payment would be made to ADF&G for its subsistence management program on the Buskin River. The mitigation plan is fully consistent with the compensatory mitigation regulations of the U.S. Army Corps of Engineers and EPA. For more information, please see Chapter 6 of the FEIS.

Comment STK 2-2
Compensatory Mitigation-
Appropriate and practicable compensatory mitigation is required for unavoidable adverse impacts, which remain after all appropriate and practicable minimization has been required.

Compensatory mitigation includes: a. restoration of existing degraded wetlands through either reestablishment or rehabilitation; if impractical then; b. enhancement of an existing wetland to improve its physical, chemical or biological characteristics to heighten, intensify, or improve specific wetland function; if impractical then; c. preservation of a wetlands site by removing the threat to, or preventing the decline of, a wetland by an action in or near a wetland; and finally and only under special circumstances; d. establishment (creation) of a wetland in an upland or deep water site where a wetland did not previously exist.

Response STK 2-2
Thank you for your comment. The proposed mitigation plan for this project (see Chapter 6 of the Final Environmental Impact Statement (FEIS)) has been developed consistent with the compensatory mitigation regulations of the U.S. Army Corps of Engineers (ACOE) and the U.S. Environmental Protection Agency (EPA) (33 CFR part 332 and 40 CFR part 230, subpart J) and compensatory mitigation guidance found in Regulatory Guidance Letter No. 09-01 of the ACOE, Alaska District.

Comment STK 2-3
Regulations require appropriate and practical compensatory mitigation to replace functional losses to aquatic resources, including wetlands considering the following to determine the practicality of compensatory mitigation: availability of suitable locations, constructability, overall costs, technical requirements, and logistics.

Response STK 2-3
Thank you for your comment. The proposed mitigation plan for this project (see Chapter 6 of the Final Environmental Impact Statement (FEIS)) meets all applicable requirements, including the compensatory mitigation regulations of the U.S. Army Corps of Engineers (ACOE) and the U.S. Environmental Protection Agency (EPA) (33 CFR part 332 and 40 CFR part 230, subpart J).

Comment STK 2-4
The Sun'aq Tribe of Kodiak requests that the FAA establish an area similar to the size of the habitat being lost from the Kodiak Airport Extension Fill of the selected alternatives to be replaced with an establishment of either a clam bed habitat and ongoing testing of paralytic shell fish poisoning in clams at the Kodiak Area which will be at no cost to tribal members or $1,000,000.00 be granted to the Sun'aq Tribe of Kodiak for the establishment of an ongoing salmon enhancement program.

Response STK 2-4
Thank you for your comment. Chapter 6 in the Draft Environmental Impact Statement (DEIS) (“Mitigation”) has been revised in the Final Environmental Impact Statement (FEIS) to describe more fully the proposed mitigation plan for this project. The request described in the comment is specifically addressed in that chapter and in separate correspondence from the FAA to the Sun’aq Tribe of Kodiak, and is the subject of continuing government-to-government consultation between the FAA and the Tribe.

Response to Koniag Corporation
King Hufford, Director of Logistics & Marketing, Resource Development
October 30, 2012

Comment KON 1
Koniag is pleased to update that we have broken ground at the Granite Cove Quarry located at Shakmanof Cove on Kodiak Island. The roadway is pioneered in and we have begun blasting rock within the right of way. Granite Cove should be a very economical and viable source for armor stone and rock materials for this project. Granite Cove is very close in proximity to the project. Our Aggregate Reports and Testing show that Granite Cove will produce very large stone meeting USACE spec. We should be in full operation and producing product at the time material will be needed.

Response KON 1
Thank you for your comment. Thank you for the information.

Response to Kodiak Audubon Society
Stacey Studebaker, Conservation Chair
December 18, 2012

Comment AB 1
Kodiak Audubon members have attended meetings, participated actively in discussions, and submitted detailed comments since the first public scoping meetings began in 2007 for the FAA's Kodiak Airport Environmental Impact Statement for proposed Runway Safety Areas (RSA). This has been a very long process and we thank you for taking the time and listening to our community to minimize, as much as possible, the impacts of the proposed RSAs.

Response AB 1
Thank you for your comment.

Comment AB 2
We are in support of the FAA's Preferred Alternatives: Alternative 2 for Runway 07/25 and Alternative 7 for Runway 18/36 as presented in Section 2.5 of the Draft EIS.

Response AB 2
Thank you for your comment.

Comment AB 3
We were greatly relieved that you got the message loud and clear that the Buskin River is vitally important to our community and that you were willing to change your minds from the original proposal.

Many times we sent you back to the drawing board to reevaluate your data in light of our concerns, local science and traditional knowledge.

Response AB 3
Thank you for your comment.

Comment AB 4
For so many reasons the Buskin River area is sacred to us as it supports important salmon habitat that supports subsistence, sport and commercial fishing, year round bird and bear habitat, and recreation activities such as birding, camping, hiking, photography and beaching combing activities. Its close proximity to our town makes is [sic] accessible to all residents and tourists.

Response AB 4
Thank you for your comment.

Comment AB 5
In the "Summary" of Section 4.5 of the Draft EIS, the following is stated and is of primary concern to us: "Aquatic habitat at the Buskin River barrier bar (north of Runway end 18) is unique in Chiniak Bay and offers one of the few low-gradient, soft-bottom areas available to juvenile salmonids from the Buskin River. These species enter marine waters via the Buskin River freshwater plume and require a transitional rearing period during which they are dependent on areas reached by the plume. Loss of this habitat north of Runway end 18 would cause significant long-term adverse effects to aquatic species and populations in the Buskin River area. Runway 07/25 Build Alternatives would significantly change the distribution of the Buskin River freshwater plume, also resulting in significant impacts."

We have many questions and concerns about the impacts of the extension of the east/west Runway 07/25 into Chiniak Bay. In addition to the impacts on the freshwater plume, there will most definitely be changes in the patterns of nearshore currents and sedimentation that will have impacts on salmon and on bird life. How this will all play out in the long run is the big question as well as how to mitigate for such uncertainty. All the modeling and technology we have at present cannot predict even the short term impacts let along [sic] the long-term impacts.

Response AB 5
Thank you for your comment. This Environmental Impact Statement (EIS) uses the best available information to describe potential future conditions for each of the project alternatives. Changes to sediment transport may occur due to the 07/25 action alternatives. As stated in the Final Environmental Impact Statement (FEIS) Water Quality Appendix (Appendix 1), the project build alternatives would isolate the remaining sediments from entering the longshore transport process.

This action could slow or stop the natural migration of the Buskin River mouth and block sediments in the existing northward sediment transport stream, isolating them south of the proposed Runway Safety Area (RSA) fill.

Birds would continue to have access to the Buskin River barrier bar and the shallow, low-gradient, soft-bottom habitat off Runway End 18. Other habitats immediately off the Runway Ends are not used as extensively as areas further away from the airport (as indicated by field surveys for this project and described in the Final Environmental Impact Statement (DEIS) and in Appendix 4). Fish would be impacted by a change in the Buskin River freshwater plume.

Chapter 6 in the DEIS ("Mitigation") has been revised in the FEIS to describe more fully the proposed mitigation plan for this project. That chapter includes a description of the applicable regulatory framework, including the compensatory mitigation regulations of the U.S. Army Corps of Engineers (ACOE) and the U.S. Environmental Protection Agency (EPA) (33 CFR part 332 and 40 CFR part 230, subpart J). The chapter explains how the proposed mitigation plan relates to the compensatory mitigation regulations and why in-lieu fee mitigation was selected for this project. In developing the plan, the Federal Aviation Administration (FAA) and the Department of Transportation & Public Facilities (ADOT&PF) coordinated with the appropriate regulatory agencies and tribal governments.

Comment AB 6

Our recommendations for mitigation are:
-Monitor salmon smolt in the Buskin River for a minimum of 10 years starting the year before construction. This would provide a more complete understanding of the Buskin salmon run and help us better understand the impacts of the RSA construction.
-Acquire land adjacent to the Buskin River State Recreation Area owned by Native of Kodiak. This area is known locally as Boy Scout Lake and has existing trails that could connect with the trails and campground of the State Recreation area to offset impacts on recreation that will occur, especially during construction of the RSAs and beyond.
-Provide an endowment for salmon restoration of the Buskin River.

Response AB 6

Thank you for your comment. Chapter 6 in the Draft Environmental Impact Statement (DEIS) ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe more fully the proposed mitigation plan for this project. That chapter includes discussion of specific mitigation options, including those suggested by the commenter. As described in that chapter, compensatory mitigation would be provided through an in-lieu fee (ILF) payment that would be used to purchase high-value habitat in the Kodiak area for preservation. An additional payment would be made to ADF&G for its subsistence management program on the Buskin River. That payment would be used either to continue the current adult escapement monitoring program or to develop a smolt enumeration study. For further explanation, please see Chapter 6 of the FEIS.

Comment AB 7
Once again, we want to express our thanks to Leslie Grey and her team who have worked with our diverse community throughout the long process to acknowledge and address our concerns and be willing to change from your original plan to come up with more reasonable alternatives. This is a model for how public involvement in a federal process should work. We also thank you for acknowledging local expertise by contracting with the Kodiak Audubon Society for doing your bird monitoring at the airport.

Response AB 7
Thank you for your comment.

Response to Kodiak State Parks Citizens Advisory Board
Mike Sirofchuck, Chairman
December 04, 2012

Comment KSPCAB 1
The KSP CAB fully supports Runway 07/25 Alternative 2 and Runway 18/36 Alternative 7, the FAA Preferred Alternatives presented in Section 2.5 of the draft EIS. We believe these alternatives will create the least impact on the Buskin River State Recreation Area, which has been our concern from the beginning of this process.

Response KSPCAB 1
Thank you for your comment.

Comment KSPCAB 2
Runway 18/36 Alternative 7 recommends that all fill be placed at the south end of the runway and that there be no extension toward the Buskin River. This alternative is a win-win situation where the runway's safety is improved without any impact from this runway on the Buskin River SRA. We agree with the FAA assessment in Section 4.5-1 "Overall, Runway 18/36 Alternative 7 would have the least (moderate level) impacts of all alternatives because it would avoid filling toward the Buskin River and no fill would occur in areas of freshwater influence." The Buskin River is a salmon fishery for both sport and subsistence fishers and we appreciate your decision to not propose any runway extension toward the river.

Response KSPCAB 2
Thank you for your comment.

Comment KSPCAB 3

Runway 07/35 [sic] Alternative 2 seems to have the least impact of the 07/35 [sic] alternatives with the shortest incursion into Chiniak Bay. However, possible impacts to currents in the area have the potential to alter fresh water and sediment movement in the area and negatively impact salmon runs in the Buskin River. Ideally, there would be no extension into Chiniak Bay, but we understand that extending the runway to the west is not a viable option.

Response KSPCAB 3

Thank you for your comment. The commenter is correct that Runway 07/25 Alternative 2 would result in a lower environmental impact when compared to Runway 07/25 Alternative 3. FEIS Section 4.5, Fish and Invertebrates, provides a description of how expected changes in current and the freshwater plume from the Buskin River could result in adverse impacts to salmonid species. Final Environmental Impact Statement (FEIS) Chapter 2, Alternatives, describes the alternatives evaluation process and describes why improving the Runway Safety Area (RSA) beyond Runway end 07 (western end of the runway) is not practicable due to terrain, navigational aids, and cost.

Comment KSPCAB 4

The draft EIS states in the "Summary" of Section 4.5: Aquatic habitat at the Buskin River barrier bar (north of Runway end 18) is unique in Chiniak Bay and offers one of the few low-gradient, soft-bottom areas available to juvenile salmonids from the Buskin River. These species enter marine waters via the Buskin River freshwater plume and require a transitional rearing period during which they are dependent on areas reached by the plume. Loss of this habitat north of Runway end 18 would cause significant long-term adverse effects to aquatic species and populations in the Buskin River area (Runway 18/36 Alternatives 2 through 6). Runway 7/25 Build Alternatives would significantly change the distribution of the Buskin River freshwater plume, also resulting in significant impacts.

The KSP CAB is deeply concerned about the projected reduction in Buskin River Salmon runs and that effect on recreational use of the Buskin River SRA. There must be mitigation for these damaging effects and we expect that Alaska DNR/State Parks will be an integral part of all mitigation discussions. The possibility of land acquisition adjacent to the Buskin River SRA and the Boy Scout Lake area of Kodiak State Parks is an excellent option for mitigation. Acquiring land that would connect these two areas with hiking trails could increase other recreational use of the area, thus offsetting, to some extent, any loss of fishing opportunities. In addition, we would support smolt studies of the river to help gain a more complete understanding of the Buskin salmon runs.

Response KSPCAB 4
Thank you for your comment. Please note that the Preferred Alternatives minimize fill placed off of Runway end 25 and do not place fill north of Runway end 18.

Chapter 6 in the Draft Environmental Impact Statement (DEIS) ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe more fully the proposed mitigation plan for this project. That chapter includes discussion of specific mitigation options, including those suggested by the commenter. As described in Chapter 6 of the FEIS, compensatory mitigation would be provided through an in-lieu fee payment that would be used to purchase high-value habitat in the Kodiak area for preservation. An additional payment would be made to ADF&G for its subsistence management program on the Buskin River. That payment would be used either to continue the current adult escapement monitoring program or to develop a smolt enumeration study. For more information, please see Chapter 6 of the FEIS.

Comment KSPCAB 5
At the beginning of this process, the KSP CAB was very concerned about proposals to extend 18/36 toward the Buskin River. We expressed our concerns to FAA officials, as did several other agencies in Kodiak. The FAA has been very responsive to our concerns and objections related to those proposals.

We would like to recognize the efforts of Leslie Grey and her team to involve the KSP CAB in the EIS process. Ms. Grey has met with our board on at least two occasions and has provided monthly updates throughout the process. More importantly, she and her team have listened to concerns and criticisms of earlier versions of the EIS and come up with far more palatable alternatives than were first proposed. Thus far, this process had been a model for how public involvement in agency decision-making should occur. The Board thanks Ms. Grey and her staff for their handling of the process and the creation of the draft EIS.

Response KSPCAB 5
Thank you for your comment.

Response to John Brown
November 10, 2012

Comment JB 1
In every case I think the maximum use of EMAS blocks is best. (I wonder how they will work when they are saturated and frozen?)

Response JB 1
Thank you for your comment. The Federal Aviation Administration (FAA) has developed guidance concerning Engineered Materials Arresting System (EMAS) and its potential application in lieu of standard Runway Safety Areas (RSAs) (see FAA Order 5200.9, Financial Feasibility and Equivalency of Runway Safety Area). After years of testing and analysis, the FAA has determined that EMAS can be constructed to provide a level of overshoot/overrun safety generally equivalent to a standard RSA, including in environments with harsh weather conditions. Several of the early EMAS installations experienced problems with moisture infiltration, and the manufacturer has maintained a continuous program of research and development to improve the product's durability and water resistance characteristics. Testing of EMAS at sites across the country has helped the FAA with determining that EMAS is feasible in harsh environments such as those at Kodiak Airport.

Comment JB 2
I was curious why there was any consideration of RY25 departures and RY7 arrivals? Both these operations are blocked by terrain. Likewise, RY18 departures.

Response JB 2
Thank you for your comment. Although not used by larger aircraft, departures from Runway 25 and arrivals to Runway 07 do occur occasionally when wind conditions dictate. The Final Environmental Impact Statement (FEIS) Chapter 2, Section 2.3, provides a description of the factors considered when developing alternatives for Runway 07/25 and Runway 18/36, including runway end use and aircraft types using each of the runways. As active runways, the Runway Safety Area (RSA) standards for each runway end needed to be evaluated and considered in the alternatives evaluation.

The terrain and runway use considerations, among others, have been documented as part of the alternatives evaluation.

Comment JB 3
An alternative I didn't see was to permanently restrict RY7/25 to not allow turbojet departures on RY7. Those aircraft could depart RY11 with little or no operational impact. I offer this as a suggestion if it will reduce the cost of the project.

Response JB 3

Thank you for your comment. Runway 11/29 is 5,399 feet in length and, because of its short length, prevailing wind direction, lack of precision approach, and surrounding terrain, is normally used only by smaller general aviation aircraft. Runway 11/29 has a generally northwest-southeast orientation. The specified critical aircraft for takeoffs was identified as the Boeing 737-400. According to data provided by Alaska Airlines, this aircraft requires a takeoff length of 6,547 feet for typical operating conditions. The U.S. Coast Guard's (USCG's) Lockheed Martin HC-130 is the most demanding for landings, requiring as much as 7,800 feet during tailwind landings at a typical mission weight of 150,000 pounds. Also, under contaminated runway/poor braking conditions, such as water or ice on the runway, a fully-loaded Boeing 737-400 aircraft requires 7,876 feet of landing length. Therefore, the existing length of Runway 11/29 (5,399 feet) does not meet the length requirements for these aircraft whereas Runway 07/25 at 7,542 feet in length provides runway length suitable for operations by larger aircraft.

Comment JB 4

I also did not see any consideration for the up slope on RY25, does the standard allow for the overrun area to be reduced due to rising terrain? If not, can a variance be obtained to allow some benefit from this otherwise annoying feature?

Response JB 4

Thank you for your comment. The Federal Aviation Administration (FAA) standards for Runway Safety Areas (RSAs) do not take into account runway slope. As described in Chapter 1, Purpose and Need, Public Law 109-115 states that not later than December 31, 2015, the owner or operator of an airport certificated under 49 U.S.C. 44706 (such as the Kodiak Airport) shall improve the airport's RSAs to comply with the FAA design standards required by 14 Code of Federal Regulations part 139 (119 Stat. 2401 Nov. 30, 2005). Those standards are contained in the FAA Advisory Circular 150/5300-13 and cannot be waived.

Response to Kelly Hawk
December 04, 2012

Comment KH 1
I attended the briefing you held with the State Parks Advisory Board last night-I was sitting in the back: I'm a park employee, so I kept quiet for the most part. I did want to say I did review the EIS and I think it is quite good. I've worked in NEPA and EIS compliance in other positions I've held, and also as an independent consultant. Suffice to say I've walked in your shoes as project manager (though my projects were at a smaller scale) and I have run the gauntlet of tedious public meetings as you are enduring currently. I wanted to say I admire your grace and professionalism under pressure, and your good humor in communicating with, let's say diplomatically, those with varying levels of knowledge or pre-meeting document review. Thanks for your good work.

Response KH 1
Thank you for your comment.

Response to Rachel King
December 04, 2012

Comment RK 1
I would like to know when the next scoping meeting is scheduled to occur.

Response RK 1
Thank you for your comment. The public hearing was conducted in December 2012 on the Draft Environmental Impact Statement (DEIS) and a public hearing was conducted on the Subsistence Evaluation on March 18th (in Washington, D.C.) and on March 21st (in Kodiak, AK). Notices for public hearings were placed in local papers, sent to media outlets, and published in the Federal Register. No additional public comment periods are scheduled. Responses to all comments received during the hearings and the public comment periods will be addressed in the Final Environmental Impact Statement (FEIS).

Response to Mike Sirofchuck
December 12, 2012

Comment MS 1
I fully support Runway 07/25 Alternative 2 and Runway 18/36 Alternative 7, the FAA Preferred Alternatives presented in Section 2.5 of the draft EIS. These alternatives will create the least impact on the Buskin River State Recreation Area.

Response MS 1
Thank you for your comment.

Comment MS 2
Runway 18/36 Alternative 7 recommends that all fill be placed at the south end of the runway and that there be no extension toward the Buskin River. This alternative is a win-win situation where the runway's safety is improved without any impact from this runway on the Buskin River SRA. I agree with the FAA assessment in Section 4.5-1 "Overall, Runway 18/36 Alternative 7 would have the least (moderate level) impacts of all alternatives because it would avoid filling toward the Buskin River and no fill would occur in areas of freshwater influence." The Buskin River is a salmon fishery for both sport and subsistence fishers, so this alternative may reduce effects on those fisheries.

Response MS 2
Thank you for your comment. The Preferred Alternatives were identified as those that met the project purpose and need while minimizing environmental impacts to the extent possible.

Comment MS 3
Runway 07/25 Alternative 2 seems to have the least impact of the 07/25 alternatives with the shortest incursion into Chiniak Bay. However, possible impacts to currents in the area have the potential to alter fresh water and sediment movement in the area and negatively impact salmon runs in the Buskin River. Ideally, there would be no extension into Chiniak Bay, but I understand that extending the runway to the west is not a viable option.

Response MS 3
Thank you for your comment. The commenter is correct that Runway 07/25 Alternative 2 would result in a lower environmental impact when compared to Runway 07/25 Alternative 3. The Final Environmental Impact Statement (FEIS) Section 4.5, Fish and Invertebrates, provides a description of how expected changes in current and the freshwater plume from the Buskin River could result in adverse impacts to salmonid species. FEIS Chapter 2, Alternatives, describes the alternatives evaluation process and describes why improving the Runway Safety Area (RSA) beyond Runway end 07 (western end of the runway) is not practicable due to terrain, navigational aids, and cost.

Comment MS 4
The draft EIS states in the "Summary" of Section 4.5: Aquatic habitat at the Buskin River barrier bar (north of Runway end 18) is unique in Chiniak Bay and offers one of the few low-gradient, soft-bottom areas available to juvenile salmonids from the Buskin River.

These species enter marine waters via the Buskin River freshwater plume and require a transitional rearing period during which they are dependent on areas reached by the plume. Loss of this habitat north of Runway end 18 would cause significant long-term adverse effects to aquatic species and populations in the Buskin River area (Runway 18/36 Alternatives 2 through 6). Runway 7/25 Build Alternatives would significantly change the distribution of the Buskin River freshwater plume, also resulting in significant impacts.

I am very concerned about the projected reduction in Buskin River Salmon runs and that effect on recreational use of the Buskin River SRA. There must be mitigation for these damaging effects and I expect that Alaska DNR/State Parks will be an integral part of all mitigation discussions. The possibility of land acquisition adjacent to the Buskin River SRA and the Boy Scout Lake area of Kodiak State Parks is an excellent option for mitigation. Acquiring land that would connect these two areas with hiking trails could increase other recreational use of the area, thus offsetting, to some extent, any loss of fishing opportunities. In addition, I support smolt studies of the river to help gain a more complete understanding of the Buskin salmon runs.

Response MS 4

Thank you for your comment. Please note that the Preferred Alternatives would not place fill north of Runway end 18 and minimize fill placed off of Runway end 25.

Chapter 6 in the Draft Environmental Impact Statement (DEIS) ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe more fully the proposed mitigation plan for this project. That chapter includes discussion of specific mitigation options, including those suggested by the commenter. As described in Chapter 6 of the FEIS, compensatory mitigation would be provided through an in-lieu fee payment that would be used to purchase high-value habitat in the Kodiak area for preservation. An additional payment would be made to ADF&G for its subsistence management program on the Buskin River. That payment would be used either to continue the current adult escapement monitoring program or to develop a smolt enumeration study. For more information, please see Chapter 6 of the FEIS.

Comment MS 5

At the beginning of this process, many Kodiak residents were very concerned about proposals to extend 18/36 toward the Buskin River. We expressed our concerns to FAA officials, as did several agencies and many citizens in Kodiak. The FAA has been very responsive to our concerns and objections related to those proposals.

I appreciate the efforts of Leslie Grey and her team to involve the Kodiak community in the EIS process. Ms. Grey has met with agencies and individuals and has provided monthly updates throughout the process.

More importantly, she and her team have listened to concerns and criticisms of earlier versions of the EIS and come up with far more palatable alternatives than were first proposed. Thus far, this process had been a model for how public involvement in agency decision-making should occur. I thank Ms. Grey and her staff for their handling of the process and the creation of the draft EIS.

Response MS 5
Thank you for your comment.

Response to Patrick Holmes
December 17, 2012

Comment PH 1
The DEIS for Runway Safety Areas (RSAs) at the Kodiak Airport improvements suggests Preferred Alternatives to create RSA areas off the east end of runway 25 (Alt.2) and the south end of runway 36 (alt.7) . Alternative 2's placement of fill material into intertidal waters at the mouth of the Buskin River will, in fact, impact the local marine environment by increasing avian predation on salmonids and dolly varden smolt and fry. This in turn has the strong probability to negatively affect future subsistence and sport harvest of salmon.

Response PH 1
Thank you for your comment. Figure 3 in the Final Environmental Impact Statement (FEIS) summary depicts the physical relationship between the Federal Aviation Administration (FAA)-identified Preferred Alternatives and the Buskin River. As noted in the FEIS Section 4.5, Fish and Invertebrates, and Section 4.11, Subsistence, there could be significant impacts to fisheries and subsistence resources resulting from the fill beyond Runway end 25 resulting from loss of habitat and changes in fish movement patterns. Those changes could result in increased predation of smolt and fry. Impacts to sport harvest are described in section 4.10, Socioeconomics; while there could be impacts on sport-fishing, they would not be significant.

Comment PH 2
While the document's introduction and text is easier read there are numerous errors and omissions of previous public and agency comments. It is still a "cut and paste" document where the "discussion" of alternatives 2 and 7 within the text do not agree with the figures for those alternatives. They appear to be the text from the preliminary draft. Many of the public will not read the text but use the figures for their information source. The compilers should do a thorough "search edit" to make sure the text agrees throughout the document with the alternatives figures. Table 2.2, alterative 7 RSA specs are different than in the text. Again an example of poor document editing. My comments on Alt. 2&7 are specific to information on the figures.

Response PH 2
Thank you for your comment. All comments received on the Draft Environmental Impact Statement (DEIS) are included within this appendix. As appropriate, changes have been made and included in the Final Environmental Impact Statement (FEIS). The project coordination appendix includes the public and agency coordination timeline and record of project coordination to provide an overview of the Federal Aviation Administration's (FAA's) outreach throughout the preparation of the DEIS and FEIS.

The text and figures for Runway 07/25 Alternative 2 are consistent in the FEIS. The typo on Figure 2-10 (Alternative 7) has been corrected in the FEIS.

Comment PH 3
These proposed alternatives are a compromise of community concerns for environmental impacts on fish and critters and their impacts on subsistence users, while providing the greatest safety enhancement (within the $50 M threshold allocated by congress for the project). It is a very difficult job to compile all of this information; overall, well done! There are some changes and clarifications that should be addressed.

Response PH 3
Thank you for your comment. The Preferred Alternatives were identified as those that met the project purpose and need while minimizing environmental impacts to the extent possible.

Comment PH 4
The EIS should differentiate between monitoring and mitigation: An ongoing sockeye smolt monitoring program would the [sic] "measure of the need for mitigation", a "canary in the coal mine," so to speak. If the "keystone species' [sic] for the Buskin is negatively affected by the RSA construction on RW 25 what good is mitigation? Sockeye are the most utilized subsistence and sport harvest as well as a food source for bears, birds and other critters. If mitigation is applied to a remediation fund used stateside, increasing parkland, enhancing other species, etc.? What is it really doing to mitigate environmental harm? Nothing!!

Both the local ADF&G staff comments and local USFWS comments for the PDEIS agree on potential impacts to salmon other than pink and chum. I believe that an ongoing smolt monitoring should be done as a function of airport operations. If there is no monitoring for smolt then RSA for RW 25 should not be done.

Response PH 4
Thank you for your comment. Generally, mitigation is intended to avoid or offset adverse effects, whereas monitoring is intended to verify project impact assessments or mitigation effectiveness.

Specific to this project, the need for mitigation is based upon the anticipated adverse impact to resources as described in the Final Environmental Impact Statement (FEIS). The appropriateness of pre- and post-construction monitoring conducted after the Environmental Impact Statement (EIS) process is completed has been coordinated with stakeholders including the Alaska Department of Fish and Game (ADF&G), the National Oceanic Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS), the U.S. Fish and Wildlife Service (USFWS), the Environmental Protection Agency (EPA), the U.S. Army Corps of Engineers (ACOE), and tribal governments, and was considered with the mitigation planning.

The Final Environmental Impact Statement (FEIS) notes that the proposed project could result in a reduction of salmonids in the Buskin River system. Data collection for the EIS was sufficient to determine the proposed project's effect on fisheries. Monitoring of sockeye smolt may provide information on the smolt abundance post construction; however, it would not be possible to conclusively associate project effects to specific changes in population because of natural variability and other unknown variables.

However, because the FAA received several comments from the community requesting a smolt monitoring program during the EIS process, the mitigation plan described in Chapter 6 of the FEIS includes a payment of $200,000 to the ADF&G to fund their subsistence management program on the Buskin River. These funds would be used either to continue the adult escapement monitoring or to develop a smolt enumeration study. This management program would aid in the management of sustainability of salmon runs and provide information that could improve management of the river for subsistence users.

Comment PH 5

A monitoring program needs to be defined in the EIS: If Alt. 2 is implemented for 7/25, it is vital that the most important subsistence species, sockeye salmon be continuously monitored. The state studies adult returns, however, a vital component is no longer addressed. That is a smolt out migrant monitoring program. It needs to be implemented as a continuing function of the airport, not simply mitigation. Out-migrating numbers and condition factor [sic] give managers an evaluation of the strength and condition of the sockeye run. It is the key to evaluating impacts of the runway's RSA extension. Monitoring for at least 2 sockeye life cycles (12 years) would determine if mitigation would be necessary at all. A smolt monitoring project could be conducted or supervised by ADF&G Sport Fish Division, which previously carried out the project with a USFWS Office of Subsistence Management grant for the project which was approximately $75,000 per year. Perhaps this could be done in partnership with local tribes as an extension of an intern program for local young folks. Could this project be funded by reducing the costs of fill by taking material from "on site"? If not, then an alternate funding method must be developed. If there is no program for smolt monitoring then Alt. 1, no action should be chosen.

Response PH 5

Thank you for your comment. Generally, mitigation is intended to avoid or offset adverse effects, whereas monitoring is intended to verify project impact assessments or mitigation effectiveness. Specific to this project, the need for mitigation is based upon the anticipated adverse impact to resources as described in the Final Environmental Impact Statement (FEIS). The appropriateness of pre- and post-construction monitoring conducted after the Environmental Impact Statement (EIS) process is completed has been coordinated with stakeholders including the Alaska Department of Fish and Game (ADF&G), the National Oceanic Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS), the U.S. Fish and Wildlife Service (USFWS), the Environmental Protection Agency (EPA), the U.S. Army Corps of Engineers (ACOE), and tribal governments, and was considered with the mitigation planning.

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However, because the FAA received several comments from the community requesting a smolt monitoring program during the EIS process, the mitigation plan described in Chapter 6 of the FEIS includes a payment of $200,000 to the ADF&G to fund their subsistence management program on the Buskin River. These funds would be used either to continue the adult escapement monitoring or to develop a smolt enumeration study. This management program would aid in the management of sustainability of salmon runs and provide information that could improve management of the river for subsistence users.

Comment PH 6

Please note: that there are many ethnic groups who rely on subsistence including multiple generations of folks with European (particularly Russian and Scandinavian), Philippino, Hispanic and Asian ethnicity. While nearly everyone relies on subsistence, it is particularly true of lower income folks. Subsistence harvest and sharing of natural wild foods is the tie that binds Kodiak's multicultural community. It is difficult to understand how the "decrease in resource" was estimated. Modeling the entire population's projected loss or utilization doesn't reflect the true cultural ramifications of loss! Often only a moderate number of subsistence harvesters will take the majority of the salmon. This harvest is distributed throughout the community to elders, widows and those who can't physically fish. Thus "reduced harvest" of the most desirable species has a much broader significance.

If there were “significant loss of subsistence resources” especially affecting the adult returns of diminished sockeye and coho smolt and pink and chum fry, many folks would be hard put to gather these species elsewhere. Long term Kodiak residents are skeptical of the airport fill and effects on salmon particularly reds (sockeye). Village elder Moses Malutin (deceased) noted that “after the military messed up the Buskin River (39/40?) there were hardly any reds after…30-35 years for them to really come back” (comment submitted at PSEIS meeting and from Sun’aq Tribal letter).

Response PH 6

Thank you for your comment. The Federal Aviation Administration (FAA) recognizes that subsistence resource harvest adjacent to the airport is very important to all user groups in Kodiak. To minimize effects to important subsistence resources, the FAA's Preferred Alternatives avoid and minimize impacts to the Buskin River to the extent possible. The Final Environmental Impact Statement (FEIS) Section 4.10 includes an assessment of potential impacts to minority and low-income populations that could result from the proposed project. We have removed the estimated decrease in subsistence harvest from this section, as the exact level of harvest reductions cannot be quantified as a result of project effects. As stated in the subsistence section of the FEIS (Section 4.11.4.2), there would be per capita reductions in abundance and availability to salmonids, but the exact level of per capita harvest reductions cannot be quantified. As noted in Section 4.10.1 (Socioeconomic Impacts), because subsistence resources affect take home resources for food, the reduction in subsistence resources per capita would likely be felt to a larger extent by low-income populations because higher income populations could generally make up the difference in subsistence use through other resources (salary, etc.).

Comment PH 7

Page 3-11: should include the Federal definition in this section as well as it’s slightly different and the Buskin is under both regulatory systems. Page 3-12, You have the federal definition in section 4: The document needs to include ducks, geese, sea lion, harbor seal, marine invertebrates, sand lance, capelin and herring (and eggs) to list of subsistence species. Also add: Access other areas by boat or plane is physically more difficult and expensive.

Response PH 7

Thank you for your comment. Consistent with your comment, the federal definition has been added to Section 3.9 of the Final Environmental Impact Statement (FEIS). Section 4.11, Subsistence, does not list all species used for subsistence, but Section 4.11 refers the reader to the Subsistence Evaluation (Appendix 12 of the FEIS) that includes a full list of the common subsistence resources in the Kodiak area. Sea lion and sand lance have been added to the list of subsistence resources in the Subsistence Evaluation.

The referenced paragraph in Chapter 3 has also been revised to include that access by boat or plane can be physically more difficult and expensive than access to the Buskin River and estuary.

Comment PH 8

Species protected under state…:
Need to add steelhead trout (rainbows) sport fish harvest is prohibited in the Buskin drainage.

Response PH 8

Thank you for your comment. Section 4.5.3.5, Species Protected Under State of Alaska Fishery Management Plans, describes species that may use the area of direct effects (i.e. the marine area, not the Buskin River) that also have a Fishery Management Plan. Though the State of Alaska has sport fishing regulations that apply to steelhead, steelhead do not have a Fishery Management Plan. Sport harvest regulations are not described in Section 4.5, but a sentence was added to the sport fishing section stating that steelhead trout sport fish harvest is prohibited in the Buskin drainage.

Comment PH 9

Figure 4.72 Haul outs…:
The subsistence marker rock (locally named "Moses's Rock") is a haul out for harbor seal in the spring.
The extension of RW25 may well physically impact the efficiency subsistence harvest from preferred sites (remember Ivar Malutin's comment about his Brother's rock).

Frankly the estimated impact in your discussion is inadequate because your consultants have not included any discussion on potential loss of sockeye and coho smolt. This information was presented by local ADF&G, FWS, tribes and myself at the PDEIS meetings. Were these meeting [sic] recorded and transcripts made? If not, why not?

Response PH 9

Thank you for your comment. The Environmental Impact Statement (EIS) has been revised to note that the harbor seals of Kodiak are part of the Gulf of Alaska stock as defined by the National Marine Fisheries Service (NMFS). The most recent Stock Assessment Report (SAR) for harbor seals estimates that the Gulf of Alaska stock includes approximately 46,000 individuals (Angliss and Outlaw 2007). According to National Oceanic and Atmospheric Administration (NOAA) data, there are six harbor seal haulouts in Chiniak Bay, which were occupied by 288 individuals in August of 2006 (Peter Boveng, Biologist at National Marine Mammal Laboratory, personal communication with Cathy Foy, SWCA, July 12, 2007).

The closest harbor seal haulout to the Airport is located on a group of rocks in Chiniak Bay, approximately 2 miles due east of the Airport shoreline (Figure 4.7-2). Kodiak residents have also observed harbor seals hauled out at a rock immediately off Runway End 25, known locally as Moses Rock.

Newly weaned young harbor seals feed primarily on shrimp and other small, benthic crustaceans. Around Kodiak, the older animals subsist mainly on Irish lord and sand lance (Jemison 2001). Additional prey species include octopus and a variety of fish, including herring, trout, cod, flounder, and salmon (Nowak 2003). The Final Environmental Impact Statement (FEIS) addresses potential reductions in salmonids as a group, since there are not data to support specific species (sockeye or coho) being a main food source for harbor seals.

The EIS and the Subsistence Evaluation note that some subsistence users would be displaced from preferred fishing locations as a result of placement of fill off Runway 07/25. However, subsistence users would still be able to access areas open to fishing under both the state and federal regulations. The FEIS and the Subsistence Evaluation Appendix acknowledge that there would be increased competition for preferred subsistence fishing spots, but the increase in competition is not expected to be significant across the population.

Chapter 6 in the Draft Environmental Impact Statement (DEIS) ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe more fully the proposed mitigation plan for this project. That chapter includes discussion of specific mitigation options, including those suggested by the commenter. As described in Chapter 6 of the FEIS, compensatory mitigation would be provided through an in-lieu fee payment that would be used to purchase high-value habitat in the Kodiak area for preservation. An additional payment would be made to ADF&G for its subsistence management program on the Buskin River. That payment would be used either to continue the current adult escapement monitoring program or to develop a smolt enumeration study. For more information, please see Chapter 6 of the FEIS.

All comments received on the Draft Environmental Impact Statement (DEIS) are included in Appendix 14 (Response to Comments). As appropriate, changes have been made to the EIS text for inclusion in the FEIS. The project coordination appendix (Appendix 13) includes the public and agency coordination timeline and record of project coordination to provide an overview of the Federal Aviation Administration's (FAA's) outreach throughout the preparation of the Preliminary DEIS, DEIS and FEIS. With the exception of the public hearings conducted for the DEIS, meetings were not recorded or transcribed.

Comment PH 10

Construction Costs:

The text seems to be limited and generalized on this topic. Do the cost analysis include actual estimates from Koniag Corp. and other local firms for rip rap and fill materials? Would not these cost [sic] be less than imported granite? It doesn't seem logical that they would cost the same as stated in the document. Why does the appendix state that "the armor rock will require "a supplemental off island source"? The Shakmanof Point site be [sic] online to provide for the breakwater at Ouzinki Harbor before the airport project begins.

Has there been an adequate evaluation of utilizing fill materials from "on site" at the airport? I understand the airport managers are interested in removing rocky materials (hills and obstructions on the property) to improve vision from the tower (safety) and improve space for support infrastructure. This should be examined further to reduce costs. Talking with local airport staff and others with experience at the Kodiak airport site leads me to conclusion that your consultant's opinion to not use the materials, do to historical or hazmats, may not be valid [sic]. My discussion with the USCG Facilities Officer indicated that this concept is an option that should be explored as it could reduce costs and address additional airport safety issues. It could well reduce safety problems from trucking in materials from off site.

Response PH 10

Thank you for your comment. The fill material analysis contained within the Final Environmental Impact Statement (FEIS) includes planning-level detail regarding the potential sources and estimated costs for construction of the proposed projects. However, additional detailed design engineering will be completed prior to construction. The cost estimates and fill sources are described and analyzed in the Construction Appendix, and include surveys and estimates from both local and other existing sources of fill. Results from the fill material analysis indicated that while adequate gravel and underlayer stone is available from sources on Kodiak Island, the rock sources on the road system are of fairly poor quality that would make it unsuitable for armor rock. Therefore, the analysis was based on the assumption that fill would come from existing, permitted sources from both on and off Kodiak Island. We understand that since the initial analysis, Koniag has broken ground on the Granite Cove Quarry. Since this quarry is permitted, it may be considered as a source for the Kodiak Airport proposed projects.

Regarding the use of on-site materials for fill, coordination was conducted with the Department of Transportation and Public Facilities (ADOT&PF), United States Coast Guard (USCG), and Kodiak Island Borough to determine what types and quantities may be available. When factoring the impact on airport operations, the low amount of materials available on-site, the type of rock and fill present, the historic military use and contamination, as well as historic preservation concerns, the Federal Aviation Administration (FAA) and ADOT&PF determined that on-site material would not be suitable for this project.

The State relies on an open bid process. As long as the bidding requirements are met, anyone can bid on a project. Because the project is federally funded, there would be no local preference.

Comment PH 11
Different EMASS for Alternatives:
Why is a 40 knot EMASS [sic] system used for RW 36 and a 70 knot EMAS used for RW 25?

Response PH 11
Thank you for your comment. The size/type of the Engineered Material Arresting System (EMAS) for each of the alternatives is related to the size of the Runway Safety Area (RSA) available for EMAS as well as the relative safety enhancement achieved by various EMAS sizes. The alternatives were developed in consideration of the Federal Aviation Administration (FAA) guidance concerning EMAS and its potential application in lieu of standard RSAs (see FAA Order 5200.9, Financial Feasibility and Equivalency of Runway Safety Area).

The Alaska Airlines Boeing 737-400 aircraft primarily uses Runway end 25 and Runway end 07; the FAA standards for this type of aircraft require a 70-knot EMAS for Runway end 25.

Comment PH 12
Runway 07/25 Alternative 2:
A major discussion point at earlier meetings was ignored in the DEIS!

This would extend the Runway end 25 RSA landmass by 400 feet long and 500 feet wide and install 70 knot Engineer Material Arresting Systems (EMAS).

Response PH 12
Thank you for your comment. The 2009 Preliminary Draft Environmental Impact Statement (PDEIS) that was reviewed by cooperating and coordinating agencies included an alternative for Runway 07/25 (PDEIS Alternative 3) that, after further evaluation, was determined to not improve the Runway Safety Area (RSA) to the extent practicable and therefore did not meet the project's purpose and need. The two build alternatives for Runway 07/25 included in the Draft Environmental Impact Statement (DEIS) and Final Environmental Impact Statement (FEIS) (Runway 07/25 Alternatives 2 and 3) both meet the project's purpose and need.

FEIS Chapter 2, Section 2.3, provides a description of the factors considered when developing alternatives for Runway 07/25 and Runway 18/36, including runway end use and aircraft types using each of the runways.

Runway 07/25 is the primary runway for Kodiak Airport and the Alaska Airlines Boeing 737-400 aircraft, which is the design aircraft for the Runway 07/25 RSA, and which primarily uses Runway end 25 for arrivals and Runway end 07 for departures. As such, the RSA beyond Runway end 25 is important for enhancing safety for aircraft operations at the airport. As explained in Chapter 2 of the FEIS, it is not feasible to improve the RSA beyond Runway end 07. However, the FAA has determined that it is practicable to meet the FAA's RSA standards for both overrun and undershoot protection beyond Runway end 25. Therefore, any alternative that would not meet those standards, like Alternative 3 in the PDEIS, would not meet the project's purpose and need.

For Runway 18/36, unlike Runway 07/25, it is feasible to improve the RSA at both ends of the runway. Runway 18/36 is used by a variety of aircraft types in both directions and the FAA has determined that for both runway ends it is practicable to meet the RSA standard for both overrun and undershoot protection for the smaller aircraft that use the runway most often (i.e., 240 feet). Thus, alternatives that would not provide at least 240 feet of RSA beyond both runway ends for Runway 18/36 would not improve the RSA to the extent practicable and therefore would not meet the project's purpose and need.

Comment PH 13

Comments on the PDEIS and DEIS (at prior meetings) by tribes, local biologists and ADF&G and USFWS noted that there would be significant impacts (avian predation) to sockeye and coho smolt as well as out migrant dolly varden and steelhead from any extension of runway 25. The DEIS text mentions impacts only for pink and chum fry yet table 2-47 states "Loss of Juvenile salmonid salmon foraging habitat… salmonid prey species habitat". This must be corrected. As mention previously Your marine coastal process model which is the basis of the DEIS comment is seriously flawed. It was based on only1 month data from a single current array, almost 300 yards south, south east of the Buskin River, for 1 month in Oct of 07. This data was extrapolated for an entire year. It was an interesting academic approach but not a realistic representation of the dynamic nature for the mouth of the Buskin and the adjacent flats. An entire year would have been much more accurate. It is common local knowledge that currents (which control sediment/beach movement) fluctuate considerably in intensity and direction; dependent on the predominant winds. This is particularly true for winter months. This error was identified when the draft analysis was presented locally was presented [sic]. It has been more the 5 years since the single array was set. Why weren't multiple arrays set near to the Buskin outlet for an entire year during that time?

Response PH 13

Thank you for your comment. Effects to all salmonids, including (and called out specifically) sockeye, coho, Dolly Varden, and Steelhead are specifically addressed in the Final Environmental Impact Statement (FEIS) in Section 4.5, Fish and Invertebrates. That section also specifies that all species mentioned in this comment use to some degree the habitat that would be filled, and all the species would be affected. Some of the species are more reliant on the impacted habitat than others and are therefore identified specifically.

The coastal process model used to assist in the assessment of changes to hydrology and circulation was prepared using existing available data and was supplemented by field measurements. The purpose of the field measurements (four acoustic doppler current profilers placed throughout the area) was for verifying the model parameters and ensuring proper calibration. It is not needed to collect data for longer than the period used (approximately one month) to meet those needs. Additional field verification and monitoring would not have resulted in a measurable change to the model input or output variables such as wind speeds, tides, and currents.

Regarding sediment and beach movement, they are described within the Water Quality Appendix (Appendix 1 of the FEIS) in Appendix C of the Water Resources Technical Memorandum (referred to as the "HEC-RAS Existing and Proposed Conditions Model Technical Memorandum"). Section 2.7 of that document describes coastal geomorphology and longshore transport in the area. The modeling effort for the project included a review of bed shear stresses for various build out alternatives; however, the model does not predict beach movement or changes. As noted in the report, sediments are transported by waves and wave-generated currents. The sediment transport assessments were based partially on long-term wind records from the airport, but primarily on the beach and nearshore morphology, historic records, and observations. These data show that the Buskin River mouth and delta are in a low energy wave environment and sediment transport is equally low. The barrier fronting the river and directed to the north shows no signs of recent breaching which would be common for a high-energy, high transport environment. The direction of the Buskin River mouth indicates that long-term sediment transport direction is northward. Occasionally, and for short durations, this direction is reversed, and more southern and easterly winds can cause the river's mouth to move a little to the south while piling up sediment on the north side of the mouth. When the storm subsides, the northward-directed transport would resume. Judging by past photography, the present river mouth location is in near equilibrium with the present transport forces and sediment supply. This process of minor north and south offsets of the river mouth would not be substantially altered by the proposed project.

Comment PH 14

Good that you readjust the hydrology model using the recently installed Stream gauge (previous based on Uganik River on the west side of the island, on a dammed river.). My apologies for missing that point earlier at your last hearing. The text should still reflect that the Gulf Side of the Island receives major flood events much more frequently then interior Alaska or "lee side" drainages.

Response PH 14

Thank you for your comment. The Environmental Impact Statement (DEIS) accurately describes the modeling process. A hydrology discussion was added in the HEC-RAS model technical memorandum (Appendix 3, Floodplains, in the Final Environmental Impact Statement) to address the differences in precipitation and runoff across Kodiak Island.

Comment PH 15

Runway 18/36 Alternative 7:

This would extend Runway end 36 RSA landmass by 600 feet, shift runway south 240 feet and install 40 knot EMAS on the north end of Runway end 18 on the existing pavement.

This seems to be a reasonable compromise solution that would diminish the environmental risks of extending the RSA over the spit at the mouth of the river to the north. While GPS programmed landings will need to be adjusted slightly there is much more room for the glide slope to the south then to the north.

Response PH 15

Thank you for your comment. Runway 18/36 Alternative 7 meets the purpose and need for the proposed project while minimizing the environmental impacts. The Federal Aviation Administration (FAA) has identified Runway 18/36 Alternative 7 as the Preferred Alternative for that runway.

Comment PH 16

It should be noted that the DEIS text still refers to "Jewel Beach" as an important herring congregation area. This is not true. The biologist who was cited in the PDEIS was referring to the importance of nearby Womens Bay as a herring aggregation and spawning area. (This has been discussed at least [sic] 3 prior meetings).

Response PH 16

Thank you for your comment. Consistent with your comment, the Final Environmental Impact Statement (FEIS) text has been revised to note that herring aggregation and spawning occur within Womens Bay, but are not known to occur within the project area. Reference to Jewel Beach as an important herring congregation has been removed.

Comment PH 17

Questions about the efficacy of EMASS systems should be addressed in the EIS construction app.:

In the western Gulf of Alaska our harsh winter marine environment is much more severe that [sic] Cordova and our airport is much closer to the ocean. Is Cordova a good test site for Kodiak? Operations and repair questions: Who pays for the repairs? (FAA, State, local community) Will the runway be closed after EMASS is activated in an emergency or if a snow-plow accidentally runs on to it and breaks the surface? Who pays for the replacement when it reaches it lifespan of 10 years: (FAA, State, Local community? [sic] Would the 70 knot EMASS on RW25 be hazardous for shortfall approach from the east on to RW25? If it should prove ineffective over time, then it should be removed and the runways hard paved and no further extension should occur on the west end of 7/25.

Response PH 17

Thank you for your comment. The Federal Aviation Administration (FAA) has developed guidance concerning Engineered Materials Arresting Systems (EMAS) and its potential application in lieu of standard Runway Safety Areas (RSAs) (see FAA Order 5200.9, Financial Feasibility and Equivalency of Runway Safety Area). After years of testing and analysis, the FAA has determined that EMAS can be constructed to provide a level of overrun safety generally equivalent to a standard RSA, including in environments with harsh weather conditions. According to the manufacturer of EMAS, the EMAS beds do not present a hazard to aircraft landing short on approach. The same level of undershoot protection is provided with or without EMAS. Testing of EMAS at sites across the country has helped the FAA with determining that EMAS is feasible in harsh environments such as those at Kodiak Airport.

The Alaska Department of Transportation and Public Facilities (ADOT&PF) is responsible for the operation and maintenance of the EMAS bed. If an aircraft or other equipment were to enter the EMAS beds resulting in a need to replace the EMAS blocks, the party responsible for the damage or ADOT&PF would be responsible for the costs of replacement.

Additionally, at the end of usable life, the replacement costs would be eligible for federal grant funding assistance similar to the funding expected to be used for its initial construction. If the EMAS is damaged due to an overrun or determined to be less than fully serviceable, the runway would not necessarily be closed but a Notice to Airmen (NOTAM) must be issued to alert airport users of the reduced performance of the EMAS. The FAA has found EMAS to be a good alternative to standard RSAs. However, if the EMAS should prove ineffective over time, additional analysis would be conducted to determine the best possible solution if the EMAS ever needed to be removed.

Comment PH 18

Section 3.2 DEIS: 4th paragraph, 3rd sentence. The purposes of the USFWS, Alaska Maritime National Wildlife Refuge has been shortened. It would be much more accurate and not misleading to cite directly from Section 303(1)(B) of ANILCA.

Response PH 18

Thank you for your comment. Consistent with this comment, the FAA has revised the text in Section 3.2 of the Final Environmental Impact Statement (FEIS) to include all refuge purposes according to Alaska National Interest Lands Conservation Act (ANILCA) Sec 303(1)(B)(i-v).

Comment PH 19

I disagree with your consultants' interpretation that ANILCA subsistence concerns (Title VIII Sections 808 & 810(a)) are overridden by Federal security concerns and the Coastguard withdrawal/ ownership of the tidelands. "The United States Coast Guard has primary jurisdiction for the submerged lands and the USFWS has secondary jurisdiction", is irrelevant. A formal ANILCA Section 810 Analysis is surely required. (I base this upon materials and briefings our Federal subsistence council has gotten from the USFWS, OSM legal council.) Subsistence management regulations includes the marine waters of Women's Bay (50 CFR 100.3(b)(1)(ii), the project area's submerged lands are U.S. Fish and Wildlife Service lands as part of the Alaska Maritime NWR, not USCG lands, although the USCG does have shared management jurisdiction. 100.3(d) doesn't support that the project area's submerged lands are exempt from ANILCA Title VIII, because § 100.3(b) specifically includes this area.

Brad Rolf's statement in November: section 100.3(d) excludes "military, U.S. Coast Guard, and Federal Aviation Administration lands… Note, the rest of the section he did not state: that are closed to access by the general public…." [sic] The waters off the mouth of the Buskin are not closed to the general public, rather they are among the highest public use areas on the island (note: prior communications from the Kodiak Audubon Society and the Kodiak State Parks Advisory Board to FAA).

The legal counsel for the Federal Subsistence Board, USFWS, Office of Subsistence Management, has advised its Advisory councils: No such withdrawal, reservation, lease permit, or other use, occupancy or disposition of such lands (Federal) which would significantly restrict subsistence uses shall be effected the head of the Federal agency having primary jurisdiction over such lands or his designee shall evaluate the effect of such use, occupancy, or disposition on subsistence uses and needs……Title VIII Section 10 also obligates the FAA to consider subsistence uses of the lands in question. The EIS process did not address this project to the local federal subsistence advisory council, Kodiak Aleutians Regional Advisory Council (KARAC), though an individual member of that council has advised them of this process. In addition, the council wrote a letter to the FAA on this project that here be no negative impacts to subsistence from the project; but its input was not discussed in the PDEIS or DEIS documents' nor acknowledged, nor has it received any correspondence on this project [sic].

Response PH 19

Thank you for your comment. Although the Federal Aviation Administration (FAA) does not concede that an Alaska National Interest Lands Conservation Act (ANILCA) Section 810 subsistence evaluation is legally required for this project, following the release of the Draft Environmental Impact Statement (DEIS) the FAA prepared a separate subsistence evaluation, one that is consistent with Section 810. The evaluation was released on February 28, 2013. Consistent with Section 810(b), the evaluation was the subject of a public comment period from February 28 to March 28, 2013, and was part of public hearings for the project held March 18, 2013 in Washington D.C. and March 21, 2013 in Kodiak, Alaska.

In accordance with ANILCA requirements, stakeholders and the public were notified of the Subsistence Evaluation release and were invited to submit comments during the comment period. Comments received from Kodiak Aleutians Regional Advisory Council as well as others regarding the Section 810 subsistence evaluation are included in the Subsistence Evaluation Appendix of the Final Environmental Impact Statement (FEIS).

Comment PH 20

The graphic description of the subsistence fishing area is unduly large: pg 4.11-13, Figure 4.11-1. This figure is much too large. The majority of the "prime" and most productive of the fishing sites are, for the most part, within 3 sets (a set is 50 fathoms or 300 feet) of the beach and the closed water markers. On an outgoing tide with off shore wind it might reach 4 sets on the SE end near RW 25.

Response PH 20

Thank you for your comment. Figure 4.11-1 has been revised in the Final Environmental Impact Statement (FEIS) and also in the Subsistence Evaluation (Appendix 12 of the FEIS) to show a smaller subsistence fishing area.

Comment PH 21

Chapter 6: Mitigation

During November 13 and 15, 2012, DEIS meetings the FAA stated, the ADOT&PF had proposed In-Lieu Fee as the preferred method for paying Compensatory Mitigation. It was also disclosed, the agency or non-profit that administers the In-Lieu Fee may not use the fund for restoration of a wetland, stream, or other aquatic resource in the Kodiak area. This is absurd! Not compensating for the species damaged in the drainage where the damage occurs in not logical. How does this solve the problem created? Why not compensate on site where the damage is done? Please answer this Question in the EIS. Perhaps this problem should be addressed to Alaska's congressional delegation for solution?

Response PH 21

Thank you for your comment. Chapter 6 in the Draft Environmental Impact Statement (DEIS) ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe in more detail the proposed mitigation plan for this project. As described in that chapter, compensatory mitigation would be provided through an in-lieu fee (ILF) payment at a 5.5:1 ratio, and an additional payment would be made to ADF&G for its subsistence management program on the Buskin River. Please see Chapter 6 of the FEIS for further explanation of the basis for the mitigation plan.

Comment PH 22
The DEIS states, “Compensatory mitigation is a method for offsetting impacts that cannot be avoided or minimized. These offsets may take many forms, such as replacement of habitat types lost, preservation or other habitats at risk, or even funding to support local or area mitigation needs”. The DEIS indicates the ADOT&PF may use conceptual planning process as a basis for a final compensatory mitigation plan.

This section needs to be discussed in much more depth and detail in the EIS document. Please note that any mitigation for damage to Buskin river stocks must be done on the Buskin River for the stocks effected not a federally [sic] wetlands project in Nebraska! If this can’t be done then Alternative 1, no action for RW 25 is the only solution.

Response PH 22
Thank you for your comment. Chapter 6 in the Draft Environmental Impact Statement (DEIS) (“Mitigation”) has been revised in the Final Environmental Impact Statement (FEIS) to describe in more detail the proposed mitigation plan for this project. As described in that chapter, compensatory mitigation would be provided through an in-lieu fee (ILF) payment at a 5.5:1 ratio, and an additional payment would be made to ADF&G for its subsistence management program on the Buskin River. Please see Chapter 6 of the FEIS for further explanation of the basis for the mitigation plan.

Comment PH 23
Appendix:
3.1 Salmon EFH
This discussion should include that steelhead (rainbows) and dolly varden are present and both spawn and rear in the Buskin drainage. Their out-migrant adults and fingerlings would face the same increased predation as salmon with the changes in the outlet shoreline and flats at the mouth of the Buskin R. resulting from the RW 25 extension disturbance of current flow. The steelhead are in very low numbers and cannot be retained in the sport fishery. It should also be noted that the Buskin lake is a “mother system” where dolly varden over-winter from mutable rivers and streams. Tagged fish from Buskin have been recovered as far away as Old Harbor and Afognak Lake. ((John Murray, Mary Whelen, Lenard Schwarz, ADF&G pers. com.. papers late 80”s early 90’s?) (MS. Whelen did a MS theis on theis topic)) [sic]

Response PH 23
Thank you for your comment. The Final Environmental Impact Statement (FEIS) states in Section 4.5.3 that though little information is available on the migration of steelhead in the Buskin River, juvenile steelhead typically migrate rapidly through estuaries and the nearshore marine environment to spend their marine residence off-shore (Quinn 2005). Steelhead are not documented to extensively use the estuary or immediate nearshore area and thus would be less impacted by the proposed project than would other species that rely heavily on these habitats.

The importance of the Buskin River basin to Dolly Varden is also noted in the FEIS in Section 4.5.3 where their use of the river and surrounding habitat is described. For example, Section 4.5.3 of the FEIS says "many Dolly Varden use other Chiniak Bay tributaries for spawning and rearing, but adults return annually to Buskin Lake in the fall to overwinter, since it is the only available lake habitat in Chiniak Bay (Whalen 1991)."

Comment PH 24
I passionately hope that the impacts will be minimal in reality and not simply obfuscated in textual Dialogue.

Response PH 24
Thank you for your comment.

Response to Wanda Schulze
December 18, 2012

Comment WBS 1
Thank you for your thorough work on the Kodiak Airport EIS. I am writing to voice my approval for alternative 2 for runway 07/25 and alternative 7 for runway 18/36. Although I would prefer no further fill in the bay near the Buskin River outlet the above options keep it at a minimum.

Response WBS 1
Thank you for your comment.

Comment WBS 2
The Buskin River salmon runs are so depended upon by the community that I am very concerned about any possible disruption. Please involve the community in any mitigation discussions. If the Buskin River SRA fishing resources decline I would support land acquisition in the area to increase trails, camping and hiking opportunities.

Response WBS 2
Thank you for your comment. Chapter 6 in the Draft Environmental Impact Statement (DEIS) ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe in more detail the proposed mitigation plan for this project. In developing the mitigation plan, the Federal Aviation Administration (FAA) and the Alaska Department of Transportation and Public Facilities (ADOT&PF) have coordinated with tribal governments, the Alaska Department of Fish and Game (ADF&G), the National Marine Fisheries Service (NMFS), the U.S. Fish and Wildlife Service (USFWS), the Environmental Protection Agency (EPA), and the U.S. Army Corps of Engineers (ACOE), and have considered all relevant comments. Please see Chapter 6 of the FEIS for more information regarding mitigation.

Response to Public Hearing Testimony: Mike Sirofchuck, Kodiak State Parks Citizens Advisory Board
December 6, 2012

Comment Hearing 1
The Kodiak State Parks Citizen Advisory Board fully supports the Preferred Alternatives in the present Draft EIS. We support Runway 7/25 Alternative 2 and Runway 18/36 Alternative 7. We believe these alternatives will create the least impact on the Buskin River State Recreation Area, and that is our area of concern with this project.

Response Hearing 1
Thank you for your comment.

Comment Hearing 2
We're glad that Alternative 7 for 18/36 places all the fill at the south end of the runway, and there's no extension toward the Buskin River, so we're very happy about that. And 7/25 does look like about 600 feet into Chiniak Bay. In an ideal situation, we prefer there was no extension into Chiniak Bay, but we understand the realities of the placement of the airport and the runway, and we are happy with that alternative.

Response Hearing 2
Thank you for your comment.

Comment Hearing 3
We realize that in the summary, in Section 4.5, you point out that there is the potential or the possibility, or even the likelihood, of negative impacts on the salmon runs in the Buskin River over time, and that also would reduce the sport fishing and the recreational experience for users of the State Park recreation area. And of course the Citizens Advisory Board is concerned about that.

Response Hearing 3
Thank you for your comment. There is the likelihood of reduced salmon runs in the Buskin River as a result of this project. However, as described in the Final Environmental Impact Statement (FEIS) Section 4.14, DOT Section 4(f), it is unlikely that reductions in populations would be of such a magnitude to result in a significant adverse impact to sport fishing. When considered in the context of all the activities, features, and attributes of the Buskin River State Recreation Site, the effects of the Preferred Alternatives would not result in substantial impairment of the Buskin River State Recreation Site.

Comment Hearing 4
As mitigation talks begin, and so forth, we hope that Parks and DNR -- Alaska DNR will be an important part of that discussion. And I understand there has been already some thought about talking to Natives of Kodiak, NOK, about the possibility of obtaining some land in the area adjacent to State Park land in the Boy Scout Lake/Buskin area.

And I think I can safely speak for the board when I say we would love to see something like that in the mitigation process. We've already been talking about -- talking to the landowners about connecting the Buskin River to the Boy Scout Lake area with trails, because there are trails in both areas but there's no connection right now. So perhaps in the mitigation process there may be an opportunity for obtaining land that would enable us to make that connection.

Response Hearing 4
Thank you for your comment. Chapter 6 in the Draft Environmental Impact Statement (DEIS) ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe in more detail the proposed mitigation plan for this project. That chapter includes discussion of specific mitigation options, including that mentioned by the commenter. As described in Chapter 6 of the FEIS, compensatory mitigation would be provided through an in-lieu fee payment that would be used to purchase high-value habitat in the Kodiak area for preservation. An additional payment would be made to ADF&G for its subsistence management program on the Buskin River. For more information, please see Chapter 6 of the FEIS.

Comment Hearing 5
We'd really like to recognize the efforts of Leslie Grey, the FAA, and her staff overall. When the preliminary EIS came out, it certainly got everyone's attention. Mainly because of a rather lengthy extension proposed that would go toward the Buskin River.

We provided quite a bit of input, both individually and as a board, to the FAA. And we feel that you, the FAA, have been very responsive to our comments and to other agencies in the community and other individuals in the community. And really, this is the way a public process and agency decision-making should happen. And so we appreciate that. We thank you for that.

Response Hearing 5
Thank you for your comment.

Response to Public Hearing Testimony: Stacy Studebaker, Kodiak Audubon Society
December 6, 2012

Comment Hearing 6
I'm Stacy Studebaker. I'm representing the Kodiak Audubon Society here. We have over a hundred members. We are the oldest non-governmental conservation organization on Kodiak Island. We get involved in all the conservation issues that involve fish and wildlife and Native lands, and things that are of interest to us in preserving habitats for pristine habitats.

And we've been involved from the very beginning with this long process. I believe it's been six to seven years; is that right? It doesn't seem that long. And we've really appreciated all the efforts that you've made to involve the Kodiak public and community throughout the whole process. It's really been great. Thanks for listening to our community and taking the time to get it right. I've never used the words "good news" and ""EIS"" in the same sentence before, but I did after I read your Preferred Alternatives, and I thank you very much. It's been a breath of fresh air to go through this process with Leslie, you and your group, compared to other EIS processes that I've been involved with over the many years that I've been in Kodiak. So I really feel like you didn't have a foregone conclusion at the beginning. You were open to changing, which is different than most, you know. We really appreciate that.

Response Hearing 6
Thank you for your comment. The Notice of Intent for preparation of this Environmental Impact Statement (EIS) was issued by the Federal Aviation Administration (FAA) in the Federal Register on February 15, 2007.

Comment Hearing 7
We were really happy that you stayed away from the Buskin River. We got out the message loud and clear from the community. That's sacred ground from many of us, for many reasons that you know well here by now. It is -- there are going to be impacts to the salmon. There's no doubt. We just have questions as to what they will be. There will be disruptions to subsistence fishing, recreation, bird watching, and many other things. And there's just so many uncertainties at this point.

Response Hearing 7
Thank you for your comment. The Federal Aviation Administration (FAA) has used the best available information and methods deemed appropriate by the regulatory agencies with oversight of the marine and freshwater resources in the Environmental Impact Statement (EIS) study area—including Alaska Department of Fish and Game (ADF&G), National Oceanic Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS), and U.S. Fish and Wildlife Service (USFWS)— to assess anticipated effects from the various alternatives.

Final Environmental Impact Statement (FEIS) Section 4.5, Fish and Invertebrates, includes a review of impacts to fish species that would result from the proposed project. Impacts to subsistence are described in Section 4.11 and impacts to recreation and bird watching are described in Section 4.14.

Comment Hearing 8
And so how do you monitor? How do you monitor -- or mitigate, rather, for such uncertainties? And the ideas that have been tossed around were monitoring salmon smolt in the Buskin. There is escapement monitoring that's been going on for many years, but maybe monitoring smolt, as well, would give us a better handle on -- more precise handle on the salmon runs and the impacts that may occur.

Response Hearing 8
Thank you for your comment. Chapter 6 in the Draft Environmental Impact Statement (DEIS) ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe in more detail the proposed mitigation plan for this project. That chapter includes discussion of specific mitigation options, including smolt monitoring. Monitoring of sockeye smolt may provide information on the smolt abundance post-construction; however, it would not be possible to conclusively associate project effects to specific changes in population because of natural variability and other unknown variables.

However, because the FAA received several comments from the community requesting a smolt monitoring program during the EIS process, the mitigation plan includes a payment of $200,000 to the ADF&G to fund their subsistence management program on the Buskin River. These funds would be used either to continue the adult escapement monitoring or to develop a smolt enumeration study. This management program would aid in the management of sustainability of salmon runs and provide information that could improve management of the river for subsistence users.

Comment Hearing 9
Also I support the State Parks' idea to acquire additional land adjacent to the Buskin River State Park Recreation Area -- and it's owned currently by the Natives of Kodiak and known as the Swampy Acres or Boy Scout Lake area -- that has a lot of recreational trails that are already used and could be connected with the State Park.

Response Hearing 9
Thank you for your comment. Chapter 6 in the Draft Environmental Impact Statement (DEIS) ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe in more detail the proposed mitigation plan for this project. That chapter includes discussion of specific mitigation options, including that mentioned in the comment.

As described in Chapter 6 of the FEIS, compensatory mitigation would be provided through an in-lieu fee payment that would be used to purchase high value habitat in the Kodiak area for preservation. For more information, please see Chapter 6 of the FEIS.

Comment Hearing 10

I do have concerns about where you're going to get all the rock to do this. I see on one of your easels over there some other -- some ideas. And I don't know if you're going to take a little bit from each one of those areas. It's going to be different kinds of rock, you know. I don't know if you're going to have to barge more rock in from other places. But it just doesn't -- looking at that, it's hard to imagine that you could get enough from those places to do the job. And that's something else you're going to have to determine. But that does concern me, because removing that much rock from various places on the island will have impacts, too.

Response Hearing 10

Thank you for your comment. Section 4.0 of the Construction Methods and Issues Report (Appendix 9 of the Final Environmental Impact Statement (FEIS)) addresses this question. In short, 23 sites were identified, 15 have been used in the past, and it is anticipated that several sites could be used to provide the types and quantities of rock needed. Barging of materials from other parts of Kodiak Island and beyond is anticipated. The Environmental Impact Statement (EIS) analysis determined that due to cost and availability, the project would use commercial material sources. As such, specific impacts resulting from the extraction of materials would be considered through the permits of those quarries. Potential impacts relating to transporting the material to the site is included in the Construction section (Section 4.22) of the FEIS.

Comment Hearing 11

We thank you. Kodiak Audubon thanks you also for involving us and enlisting us to provide some of the bird monitoring data in the very, very beginning part of the process. Rich MacIntosh, our bird expert, provided that. I think he did a two-year study monitoring the birds at the ends of the runway. So we appreciate that you enlisted local people to help with that.

Response Hearing 11

Thank you for your comment.

Comment Hearing 12

So Kodiak Audubon supports your Preferred Alternatives. And again, I want to thank, Leslie, you and your crew for the good work that you've done in involving the community so carefully.

Response Hearing 12
Thank you for your comment.

Response to Public Hearing Testimony: Patrick Holmes
December 6, 2012

Comment Hearing 13
I'm Pat Holmes. And I do appreciate you folks. And like Leslie said -- I mean, Stacy said, that, you know, one doesn't usually say positive things about an EIS at this point. I know when we had the old CS development in early '70s, I could heat my house for two weeks with old EISes.

Response Hearing 13
Thank you for your comment.

Comment Hearing 14
But I do disagree with your consultants on some of the fish definitions. I've fished the Buskin since 1963. And I spent probably 15, 20 years watching Uncle Iris -- Brother Moses fish before I got up enough courage to go have coffee with him. And it's unfortunate he passed away, but he probably knew more about the Buskin, and the currents, and where fish are, and relationships of when -- the beach filling, and hydrology, you name it. He didn't have the right technical terms for it, but he really knew what happened at the Buskin. And when we have winds with -- winters with easterlies, sometimes we get a lot of filling, and winters -- or anyway, the predominant winds during winter make a lot to do with what the beach topography is.

Response Hearing 14
Thank you for your comment. Section 4.5, Fish and Invertebrates, provides a description of the habitat for fish and other aquatic species within the project area as well as expected impacts to those species resulting from the proposed project. The description of fish habitats and impacts has been developed in consultation with agencies having expertise and jurisdiction over the resources, including the Alaska Department of Fish and Game (ADF&G), the National Oceanic Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS), and the U.S. Fish and Wildlife Service (USFWS).

The commenter is correct that the predominant winds during winter are a factor in beach topography. The sediment transport assessments were based partially on long-term wind records from the airport and historic photographs but primarily on the beach and nearshore morphology. Sediment and beach movement are described within the Water Quality Appendix Coastal and Near-Shore Processes Description Circulation and Water Quality Modeling, and Wave Modeling Report.

Section 2.7 of that report describes coastal geomorphology and longshore transport in the area. The modeling effort for the project included a review of bed shear stresses for various build out alternatives; however, the model does not predict beach movement or changes. As noted in the report, sediments are transported by waves and wave-generated currents. The sediment transport assessments were based partially on long-term wind records from the airport, but primarily on the beach and nearshore morphology, historic records, and observations. These data show that the Buskin River mouth and delta are in a low-energy wave environment and sediment transport is equally low. The barrier fronting the river and directed to the north shows no signs of recent breaching which would be common for a high-energy, high-transport environment.

The direction of the Buskin River mouth indicates that long-term sediment transport direction is northward. Occasionally, and for short durations, this direction is reversed by more southern and easterly winds which that can cause the river's mouth to move a little to the south while piling up sediment on the north side of the mouth. When the storm subsides the northward-directed transport would resume. Judging by past photography, the present river mouth location is in near equilibrium with the present transport forces and sediment supply. This process of minor north and south offsets of the river mouth would not be substantially altered by the proposed project.

Comment Hearing 15
And I've commented before. I think probably your Alternates 2 and 7 are probably about the most reasonable compromise. I haven't seen an EIS compromise before.

Response Hearing 15
Thank you for your comment.

Comment Hearing 16
I still do have some heartburn about the extension of Runway 25's sticking out, because I do feel that that will cause more sedimentation at the mouth of the river. And I've been down many times in the early spring, in late April, May, when the smolt do go out. Fry go out a little bit earlier from the pinks and chum, not that there are a lot of chums there. But you can basically go down there on a good minus tide and watch the eagles and seagulls really having a wonderful buffet. And if you take your spotting scope, you can pretty much see what they're eating, and it's a lot of smolt. And so that, as I mentioned at previous times, is a major concern for me.

Response Hearing 16
Thank you for your comment. The Federal Aviation Administration (FAA) appreciates your concerns. Final Environmental Impact Statement (FEIS) Section 4.6, Waterbirds, documents effects to birds from reduced food resources and the potential for increased competition for prey amongst different species.

FEIS Section 4.11.1 notes that a loss of habitat could also increase competition between and among species for food and cover. FEIS Section 4.5, Fish and Invertebrates discusses how reduction of species within the Buskin system could reduce food and nutrients for a broad range of invertebrates, other fish species, birds, mammals, and riparian vegetation.

Comment Hearing 17

And I think probably -- the concept that I think that should be defined is that there should be a monitoring program for sockeye smolt. The department has lost their funding. In the mid-'80s, I welded a good part of -- the first weir for the Buskin for adults. And I had six research projects that I implemented then. I went down a few months ago. None of those projects exist anymore. Sport Fish Division was funded by the Office of Subsistence Management through the Federal Subsistence Council to do smolt. And studying of smolt, all the grants, that tells you what has happened the entire winter in the lake. It tells you the health of the river, and it gives you a really good idea of cause and effect.

Response Hearing 17

Thank you for your comment. Chapter 6 in the Draft Environmental Impact Statement (DEIS) ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe more fully the proposed mitigation plan for this project. That chapter includes discussion of specific mitigation options, including smolt monitoring. Monitoring of sockeye smolt may provide information on the smolt abundance post construction; however, it would not be possible to conclusively associate project effects to specific changes in population because of natural variability and other unknown variables.

However, because the FAA received several comments from the community requesting a smolt monitoring program during the EIS process, the mitigation plan includes a payment of $200,000 to the ADF&G to fund their subsistence management program on the Buskin River. These funds would be used either to continue the adult escapement monitoring or to develop a smolt enumeration study. This management program would aid in the management of sustainability of salmon runs and provide information that could improve management of the river for subsistence users.

Comment Hearing 18

I don't see any mitigation that can be done that would compensate if we lose production of sockeye at the Buskin. That's the predominant species for subsistence. There's also, you know, heavy sport fishery on them, as well as coho and pinks. But of course Iver would disagree because he loves pink salmon, and any time I bring up pinks he thinks that's just as good as reds, or better. Because when he was a little boy or a young man, there weren't many reds in the Buskin. And that's because, in talking to Moses, in 1939, when they started filling and displacing the river, he saw it basically -- Would Moses say, "Go to hell"?

Response Hearing 18
Thank you for your comment. Please see Chapter 6 of the Final Environmental Impact Statement for a detailed description of the proposed mitigation plan for this project.

Comment Hearing 19
But anyway, the numbers of reds really went down for quite a while, to where most of the folks in town, unless they had -- and most of them were roeing then. You know, that just really eliminated a major sockeye source for the community. And so folks here are really, really sensitive when it comes to things that will affect sockeye. And I think that there should be a monitoring program for sockeye. Smolt going out gives you the best index of what's happening in the whole system. And whether that monitoring is done by whatever agency or partnerships with the tribal communities -- I know Sun'aq's got a program now that they're working on. I think that that's something that absolutely must be done. It's not mitigation. It's not compensation. It's seeing cause and effect. And if you see cause and effect, there are ways scientists, the fisheries folks, can tell you something went wrong in the lake and something went wrong as far as the number of returning parents. They can tell you if there's diseases. But if all those things are good and the runs start to diminish like they did after 1939, then you got a problem. Then you need to think about mitigation.

Response Hearing 19
Thank you for your comment. Chapter 6 in the Draft Environmental Impact Statement (DEIS) ("Mitigation") has been revised in the Final Environmental Impact Statement (FEIS) to describe more fully the proposed mitigation plan for this project. That chapter includes discussion of specific mitigation options, including smolt monitoring. Monitoring of sockeye smolt may provide information on the smolt abundance post construction; however, it would not be possible to conclusively associate project effects to specific changes in population because of natural variability and other unknown variables.

However, because the FAA received several comments from the community requesting a smolt monitoring program during the EIS process, the mitigation plan includes a payment of $200,000 to the ADF&G to fund their subsistence management program on the Buskin River. These funds would be used either to continue the adult escapement monitoring or to develop a smolt enumeration study. This management program would aid in the management of sustainability of salmon runs and provide information that could improve management of the river for subsistence users.

Comment Hearing 20
I think it would be really swell to get NOK land for the parks. But I think mitigation should be an entirely separate discussion, from monitoring the sockeye smolt and monitoring the health of the river.

I think that the extension with the EMAS, that's probably the best you can do. And you know -- but I think you need to have a monitoring program. It should be just part of the airport operations, whether it's funded through Wolfgang shop and transferred to the department or done in the partnership, you know, we'd still be trying to get the funds on the federal council for smolt. But I just think those are two entirely different issues: mitigation and monitoring.

Response Hearing 20

Thank you for your comment. Generally, mitigation is intended to avoid or offset adverse effects, whereas monitoring is intended to verify project impact assessments or mitigation effectiveness. Specific to this project, the need for mitigation is based upon the anticipated adverse impact to resources as described in the Final Environmental Impact Statement (FEIS). The appropriateness of pre- and post-construction monitoring conducted after the Environmental Impact Statement (EIS) process is completed has been coordinated with stakeholders including the Alaska Department of Fish and Game (ADF&G), the National Oceanic Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS), the U.S. Fish and Wildlife Service (USFWS), the Environmental Protection Agency (EPA), the U.S. Army Corps of Engineers (ACOE), and tribal governments, and was considered with the mitigation planning.

The Final Environmental Impact Statement (FEIS) notes that the proposed project could result in a reduction of salmonids in the Buskin River system. Data collection for the EIS was sufficient to determine the proposed project's effect on fisheries. Monitoring of sockeye smolt may provide information on the smolt abundance post construction; however, it would not be possible to conclusively associate project effects to specific changes in population because of natural variability and other unknown variables.

However, because the FAA received several comments from the community requesting a smolt monitoring program during the EIS process, the mitigation plan described in Chapter 6 of the FEIS includes a payment of $200,000 to the ADF&G to fund their subsistence management program on the Buskin River. These funds would be used either to continue the adult escapement monitoring or to develop a smolt enumeration study. This management program would aid in the management of sustainability of salmon runs and provide information that could improve management the river for subsistence users.

Comment Hearing 21

I have -- several of my questions on EMAS were answered. I did ask the question to Brad about a local source of fill rock to go along with the granite riprap, and I -- you know, while most people will say to you, well, what are you going to charge for X amount of fill, I think that the question of fill -- from the hill over where Northern Air Cargo used to be, and then part of what obstructs the view of Runway 25, I understand there's, quote, "heritage issues," and whatnot.

But I think there's enough people in town. Iver probably -- he doesn't use an iPhone either, but he'd got a pile of index card of old major politicians that he calls up all the time. And if there were a problem of historic question out there versus getting a reduced cost of materials for fill, local, close, right there, I bet you Iver could get it done. And as I mentioned before, I would like to see, you know, local contractors. And at this point for your document, they'll say, well, we'll just charge what everybody else does. But I can assure you the folks at Koniag or Brechan, or whoever is going to be bidding on that construction, once they get an idea that somebody from the States is going to be hauling rock from British Columbia, will come up with a good price that can get this done.

Response Hearing 21

Thank you for your comment. The fill material analysis contained within the Final Environmental Impact Statement (FEIS) includes planning-level detail regarding the potential sources and estimated costs for construction of the proposed projects. However, additional detailed design engineering will be completed prior to construction. The cost estimates and fill sources are described and analyzed in the Construction Appendix, and include surveys and estimates from both local and other existing sources of fill. Results from the fill material analysis indicated that while adequate gravel and underlayer stone is available from sources on Kodiak Island, the rock sources on the road system are of fairly poor quality that would make it unsuitable for armor rock. Therefore, the analysis was based on the assumption that fill would come from existing, permitted sources from both on and off Kodiak Island. We understand that since the initial analysis, Koniag has broken ground on the Granite Cove Quarry. Since this quarry is permitted, it may be considered as a source for the Kodiak Airport proposed projects.

Regarding the use of on-site materials for fill, coordination was conducted with Alaska Department of Transportation & Public Facilities (ADOT&PF), U.S. Coast Guard (USCG), and Kodiak Island Borough to determine what types and quantities may be available. When factoring the impact on airport operations, the low amount of materials available on-site, the type of rock and fill present, the historic military use and contamination, as well as historic preservation concerns, the Federal Aviation Administration (FAA) and ADOT&PF determined that on-site material would not be suitable for this project.

The State relies on an open bid process. As long as the bidding requirements are met, anyone can bid on a project. Because the project is federally funded, there would be no local preference.

Comment Hearing 22

I've got several other small points, but the main thing is, I do disagree with your biologist on the thing that there won't be an impact on sockeye. And I really do think that the monitoring is something that must be done. And thank you. And I'll send you my letter with all the other details. But like the other folks, I do appreciate all the time you've spent, and that for the most part, you've actually listened to local folks. And so if I had my hat on, I'd take it off, because our experience with some federal agencies has not been quite as responsive.

Response Hearing 22

Thank you for your comment. Effects to all salmonids, including (and called out specifically) sockeye, coho, Dolly Varden, and Steelhead are specifically addressed in the Final Environmental Impact Statement (FEIS) in Section 4.5, Fish and Invertebrates. This section also specifies major loss of juvenile salmonid rearing and foraging habitat; major loss of salmonid prey species habitat; minor increased stormwater runoff; major changes to freshwater plume; moderate changes to sediment transport; moderate decrease in ability of Buskin River mouth to migrate; and major potential localized changes to aquatic assemblages which would result in significant impacts to fisheries resources, including sockeye salmon.

The appropriateness of pre- and post-construction monitoring conducted after the Environmental Impact Statement (EIS) process is completed has been coordinated with stakeholders including the Alaska Department of Fish and Game (ADF&G), the National Oceanic Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS), the U.S. Fish and Wildlife Service (USFWS), the Environmental Protection Agency (EPA), the U.S. Army Corps of Engineers (ACOE), and tribal governments, and was considered with the mitigation planning.

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Comment Hearing 23
And one more time, if -- if you monitor the smolt, that's your canary in the coal mine. And that should be an entirely separate thing, under the discussions of mitigation.

Response Hearing 23
Thank you for your comment. Generally, mitigation is intended to avoid or offset adverse effects, whereas monitoring is intended to verify project impact assessments or mitigation effectiveness. Specific to this project, the need for mitigation is based upon the anticipated adverse impact to resources as described in the Final Environmental Impact Statement (FEIS). The appropriateness of pre- and post-construction monitoring conducted after the Environmental Impact Statement (EIS) process is completed has been coordinated with stakeholders including the Alaska Department of Fish and Game (ADF&G), the National Oceanic Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS), the U.S. Fish and Wildlife Service (USFWS), the Environmental Protection Agency (EPA), the U.S. Army Corps of Engineers (ACOE), and tribal governments, and was considered with the mitigation planning.

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Response to Public Hearing Testimony: Iver Malutin

Comment Hearing 24
And we want food for the table. We are a tribe, and that's what we survive on, the food for the table, hopefully from the water, the land, and the air. But anyway, beyond that, a corporation is money for the pocketbook. I was the president of the Afognak Native Corporation, one of the most successful corporations in the state today, as far as the Native corporations. And I don't want you to get them mixed up. When we're talking about NOK, that's really nice because they do own the land and they do have access to that land. But as far as the leadership of NOK and the tribe, it's totally two different entities, even if it's all the same Native people. And that would have to be spelled out really clearly.

Response Hearing 24
Thank you for your comment. FEIS Section 4.11, Subsistence Resources and Uses, and the Subsistence Evaluation Appendix discusses impacts to subsistence users. The Federal Aviation Administration (FAA) recognizes that Natives of Kodiak (NOK) and the Sun'aq Tribe are two different entities.

Comment Hearing 25
And I'm really skeptical about anything that develops in Kodiak, because I was here during World War II. I was ten years old, and I can remember what the federal government did to us. And I'm still having some bad thoughts about that. We lost so much. There was 430 Natives living in Kodiak. And by your numbers, they brought in 10,000 Army and 2,000 civilians at the beginning, and then they brought in thousands more later, which totally drew us away from our subsistence lifestyle.

Response Hearing 25
Thank you for your comment. The Federal Aviation Administration (FAA) recognizes the past effects on subsistence activities and resources from undertakings near the Buskin River, including the military base at the airport. Historical information on pre-WWII fishing and WWII changes at the Buskin River have been added to the Subsistence Evaluation Appendix. These effects, as well as those that would be added by the proposed runway safety area improvements and other projects unrelated to the airport are discussed in Chapter 5, Cumulative Effects, in the Final Environmental Impact Statement (FEIS).

Comment Hearing 26
And "subsistence" is a word that came in after statehood, in my estimation 1959. It's a new word to us. That never was in our vocabulary. But I'm still skeptical about federal law. I am. Because even though you say that this isn't going to happen, you could say it all you want, but it still can happen. And you're not going to know it until five or ten years or 15 years later to see the result, if in fact you're right or you're wrong.

Response Hearing 26
Thank you for your comment. As used in the Final Environmental Impact Statement (FEIS), the term "subsistence" encompasses all manner of harvesting natural resources, particularly biological resources, for personal consumption and use. It includes harvest activities of all rural residents of Kodiak as well as the customary and traditional practices of Alaska Natives. The Federal Aviation Administration (FAA) has used the best available information and methods deemed appropriate by the regulatory agencies with oversight of the marine and freshwater resources in the Environmental Impact Statement (EIS) study area—including the Alaska Department of Fish and Game (ADF&G), National Oceanic Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS), and U.S. Fish and Wildlife Service (USFWS)— to assess anticipated effects from the various alternatives.

Comment Hearing 27
Because my mother said if you weren't there, you didn't see it, you can't say it. If you were there, you did see, be awful careful what you say. So when a biologist says that the fish aren't going to be -- we're not going to be bothered by the improvement, or the biologists say we are, they're both making a guess based on the information that they have. And one of them got to be right.

Response Hearing 27
Thank you for your comment. The Federal Aviation Administration (FAA) has used the best available information and methods deemed appropriate by the regulatory agencies with oversight and jurisdiction of the marine and freshwater resources in the Environmental Impact Statement (EIS) study area— the Alaska Department of Fish and Game (ADF&G), the National Oceanic Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS), and the U.S. Fish and Wildlife Service (USFWS)—to assess anticipated effects from the various alternatives.

Comment Hearing 28
So that's why I'm still skeptical about federal law. It just scares me that here we go again. And even though the resource isn't as plentiful as it was years ago, it bothers me that Karluk, being the largest red salmon stream in the world, can't be brought up to standards today, with all the technology we have, with all the resources we have. And if in fact there was 6,000 cases of salmon put up in the tin canneries in the Karluk River in one season, seems to me like research should have said that. Maybe that's over-fishing; maybe it isn't. But whatever the reasons are, they made a mistake. Years later, they couldn't even get subsistence in Karluk, and now we're struggling to survive in Karluk.

Response Hearing 28
Thank you for your comment.

Comment Hearing 29
So those are the things that really, in the back of my mind -- I can talk about this, because not many people were here at the time that I'm talking about. And I'm still skeptical of federal law because there have been too many laws nationally that impact Kodiak, a little tiny town of 14,000 people. I can see not many things that can really make Kodiak grow to encourage three Alaska Airlines planes a day, or four, or five. But I can see where maybe we'll have one, or maybe none, depending on the resource. So based on that, I'm really, really just sitting here thinking and wondering.

Response Hearing 29
Thank you for your comment. The purpose and need for the project is not to increase the number of aircraft operations at the airport or encourage economic development. Rather, it is to meet federally mandated safety standards to the extent practicable. Please, see Chapter 1, Purpose and Need of the Environmental Impact Statement (EIS) for more information about why safety area improvements are being proposed for the Kodiak Airport.

Comment Hearing 30
And I just hope we make the right decisions. And we're not really going to know the right decisions until time comes in.

Response Hearing 30
Thank you for your comment. The Federal Aviation Administration (FAA) has used the best available scientific data and considered the informed input of the local community and other members of the public, including regulatory agencies with jurisdiction over the affected areas and resources, to inform our decision regarding the selection of alternatives.

Comment Hearing 31
And one of the things that I was reading in the paper was about I'm not going to be able to fish in my favorite spot. There's one little rock out there, and Pat has a name for that rock. It's Moses Malutin Rock. And 50 fathoms from that rock is where you set your net. You go in 50 fathoms towards the beach. And then there's another 50 fathoms at the end of your net to the beach that you don't need. There's that one spot where the fish really, really come in there heavy. I mean heavy. We get all the fish there. And I'm going to lose that spot. And you're telling me you're going to get me another place to fish. And if we've been fishing here for thousands of years, and all of a sudden you're going to come in here and get me another place to fish, I just would be so thankful if you could find me another place like Moses Malutin Rock.

Response Hearing 31
Thank you for your comment. The Environmental Impact Statement (EIS) and the Subsistence Evaluation note that some subsistence users would be displaced from preferred fishing locations as a result of placement of fill beyond Runway end 25. However, subsistence users would still be able to access areas open to fishing under both the state and federal regulations. The EIS and Subsistence Evaluation acknowledge that there would be increased competition for preferred subsistence fishing spots, but the increase in competition is not expected to be significant across the population.
